Review of Prospectus for Newstech Recycling Inc.'s De-inking Plant

Prepared by:
Steering Committee of the
Major Project Review Process
August 1990

Ministry of Regional and Economic Development
Ministry of Environment

91-02248/

Canadian Cataloguing in Publication Data

British Columbia. Steering Committee of the Major Project Review Process
Review of prospectus for Newstech Recycling Inc.'s de-inking plant

Co-published by Ministry of Environment.
ISBN 0-7726-1196-3

1. Newsprint industry - Environmental aspects - British Columbia - Coquitlam. 2. Newstech Recycling inc. 3. Waste paper - British Columbia - Coquitlam - Recycling. 4. Printing-ink. I. British Columbia. Ministry of Regional and Economic Development. II. British Columbia. Ministry of Environment. III. Title.

TD195.P37B76 1990 676'.142 C90-092234-6

EXECUTIVE SUMMARY

Newstech Recycling Inc. is proposing to establish Western Canada's first newsprint de-inking facility in Coquitlam, British Columbia. The proposed plant has been designed to use 140,000 air dry metric tons of old newspapers and magazines, from British Columbia and other Western provinces, to produce 122,500 metric tons of de-inked pulp annually.

This plant will assist British Columbia's newsprint manufacturers in their efforts to meet new requirements for recycled fibre content in traditional markets. Many U.S. states, including California, which is the largest market for British Columbia newsprint producers, have recently enacted legislation requiring newspaper publishers to have their newsprint contain a substantial percentage of recycled fibre.

This project would allow the British Columbia newsprint industry, which produces approximately 2 million metric tons of newsprint annually from virgin fibre, to secure approximately six per cent of its raw material requirements from recycled fibre produced locally.

Newstech filed its Prospectus with the Major Project Steering Committee (MPSC) on April 26, 1990. The Prospectus was distributed to federal, provincial, regional and municipal officials, and to public libraries in the municipalities of Coquitlam, Burnaby, Delta, Vancouver, Richmond, New Westminster, Port Coquitlam and Surrey. The availability of the Prospectus in these libraries was advertised by the proponent in the Vancouver Sun, Vancouver Province and Tri-City News. In addition, organizations such as the Westcoast Environmental Law Association, the Society Promoting Environmental Conservation, the Greenpeace Foundation of Canada, the Health Action Network, and the British Columbia Medical Association were each provided with a copy of the Prospectus for their review.

Comments from the public and government agencies were received by the MPSC until the first week in June, 1990. The major issues of concern were the disposal and potential toxicity of the solid waste and effluent.

The MPSC's review of the public and government agency comments lead to the conclusion that these issues could be adequately addressed by requiring further treatment of the effluent discharge and by the introduction of a strict monitoring and testing program. The MPSC, therefore, agreed to grant Approval-in-Principle to Newstech's project, subject to the company agreeing to meet the following eight conditions:

- establishment of a raw material inputs and waste disposal monitoring and research program to be overseen by a committee chaired by the GVRD;
- no sludge disposal to landfill after three years;
- secondary treatment of all effluent (discharge must meet GVRD's sewer use requirements and new Pulp and Paper Regulations under Fisheries Act);
- preparation of an emergency response plan (this will cover seismic activity, flooding, chemical spills, etc.);
- air emissions to meet GVRD requirements;
- prior notice of intent to use different chemicals in the process;
- contamination testing of site; and
- inspection of site to ensure that archaeological resources protected under the Heritage Conservation Act are not inadvertently disturbed.

These conditions address all major technical concerns raised by government agencies and the public regarding the Newstech proposal. They are described in further detail in the "Major Project Steering Committee Review and Decision" section of this report.

Before formal Approval-in-Principle was granted, a written assurance that these conditions would be met was required from the proponent. This written assurance has been received, and formal Approval-in-Principle has been granted.

TABLE OF CONTENTS

I. INTRODUCTION/BACKGROUND

II. PROJECT DESCRIPTION

III. THE MAJOR PROJECT REVIEW PROCESS

IV. SUMMARY OF PUBLIC COMMENTS

V. SUMMARY OF GOVERNMENT AGENCY COMMENTS

VI. MAJOR PROJECT STEERING COMMITTEE REVIEW AND DECISION

APPENDICES

Appendix 1	Newstech Public Notice
Appendix 2	Public Comments
Appendix 3	Government Agency Comments
Appendix 4	MPSC Correspondence with Newstech

I. INTRODUCTION/BACKGROUND

Newstech Recycling Inc. is proposing to construct Western Canada's first newsprint de-inking facility in Coquitlam, British Columbia. The proposed facility would process 140,000 air dry metric tons per annum of old newspapers and magazines into 122,500 air dry metric tons per annum of recycled fibre suitable as a replacement for virgin fibre, in the manufacture of newsprint. The project is expected to create a local market for old newspapers and magazines collected from recycling programs throughout British Columbia, Alberta, and possibly Saskatchewan, and would provide British Columbia newsprint manufacturers with a local source of post consumer waste for use in the manufacture of newsprint.

Newstech's proposed recycling plant has been reviewed under the Major Project Review Process (MPRP). In accordance with the MPRP Guidelines, Newstech submitted a Prospectus on April 26, 1990, which provided an overview of the project and addressed the potential environmental and socioeconomic impacts of the project. As required by the MPRP, the Prospectus is a public document, and was advertised and made available for public viewing and comment at numerous public libraries throughout the Lower Mainland.

II. PROJECT DESCRIPTION

Newstech's proposed recycling facility would process approximately 140,000 air dry metric tons per annum of old newspapers and magazines and turn this solid waste into approximately 122,500 air dry metric tons per annum of re-usable paper making fibre. This recycled fibre is to be sold to local newsprint manufacturers as a partial replacement for virgin fibre which has been the traditional ingredient in the manufacture of newsprint in British Columbia.

Newstech's proposed operation at 122,500 air dry metric tons per annum is smaller than most de-inking facilities. Newstech states that the scale of its project has been set at a level which balances the availability of fibre in the region, the minimum size to achieve economy of scale in capital and operating costs, and the desire to achieve a meaningful recycled furnish component of 6% in British Columbia's newsprint manufacture.

Newstech plans to locate its facility in the Fraser Mills industrial area of Coquitlam, adjacent to the Fraser River. The land in this area is zoned M-1 (General Industrial), and has been used for industrial purposes and as a deposit area for dredge fill, aggregates, and municipal wastes for several decades. Newstech's proposed site is presently under application for rezoning to M-5 (Recycling and Salvage Industries).

II.1 Raw Materials

Newstech anticipates sourcing approximately half of its initial raw material requirements from old newspapers and magazines originating in British Columbia, with the balance coming from Alberta and Saskatchewan. The ratio of old newspapers to magazines will be approximately 80:20.

Newstech estimates that approximately 227,700 metric tonnes of old newspapers and magazines are presently going to landfill or incinerators in these three provinces each year, and are potentially available as raw material for its operation. Assuming that newspaper and magazine recycling rates in British Columbia, Alberta, and Saskatchewan can be increased from 30, 15 and 15 percent, respectively, to 70, 60 and 40 percent, Newstech calculates that sufficient supply of raw material will be available from Western Canada for its plant.

Newstech estimates that 66,000 metric tons of old newspapers and magazines will be available from sources in British Columbia, including 18,000 metric tons which are presently exported to Oregon and the Far East by local recycling companies. This also includes 30,000 to 40,000 metric tons annually from the Greater Vancouver Regional District (GVRD), which Newstech hopes to obtain commitments for through a long-term supply agreement with the GVRD.

From its total projected intake of 140,000 air dry metric tons per annum of old newspapers and magazines from all sources, Newstech will reduce the solid waste to approximately 15,400 air dry metric tons per annum. Therefore, even though some old newspapers and magazines will be imported from outside the GVRD, Newstech's activity will result in a decrease of net loading to solid waste disposal within the region.

II.2 Process Description

Newstech proposes to apply latest proven technology and equipment to the manufacture of its recycled newsprint furnish. A combination of flotation and washing processes is proposed by the company to separate and remove the ink from the fibre in the old newspapers and magazines.

Flotation is a chemi-mechanical process designed to separate the ink particles from the recycled fibre by floating them to the surface, where they can be skimmed off for dewatering and disposal. In this process, small air bubbles are injected at the bottom of flotation cells. As these bubbles rise, they collect the ink particles and form a froth on the surface. A soap solution applied in the mixing tanks at the front of the de-inking lines ensures that fibres do not stick to the air bubbles.

Washing is a mechanical process of rinsing ink, ash and dirt particles from pulp, with ink particles then being separated from the wash water by flotation in a separate clarifier.

Newstech's process provides for three white water wash cycles with in-loop white water treatment. The process line includes medium consistency batch pulping, early contaminant removal, coarse screening, flotation de-inking, low consistency centrifugal cleaning, wash/pressing, brightening, fine screening, reverse cleaning, dispersion, washing, dewatering and a wet lap machine for pulp bale formation.

II.3 Chemicals and Process Additives

Chemicals and process additives are documented in Newstech's Prospectus. The chemicals to be used in the Newstech process represent the normal complement of chemical additives used in newsprint de-inking facilities world-wide. All chemical storage facilities will have containment provisions in the event of a spill/failure which are able to contain 125 percent of the contents' volume.

II.4 Liquid Effluent

Newstech has proposed that effluent from the de-inking process undergo primary treatment in a dissolved air flotation clarifier. Suspended solids and sticky contaminants would be removed in this process. Water would then be treated in a 24 hour aerated stabilization tank for reduction of BOD5 prior to release to the GVRD sewer system.

Newstech anticipates that there will be no detectable dioxins in the effluent. The small amounts of these contaminants which may be present in waste paper will tend to remain associated with the pulp fibre.

Acute toxicity of the treated effluent as determined by the Standard Methods bioassay will be at or below the level in the GVRD interceptor stream into which the Newstech treated effluent will discharge. As noted in section VI, Newstech's effluent discharge will be required to meet GVRD's sewer use requirements and the levels of BOD, suspended solids, and toxicity of the Pulp and Paper Regulations under the federal Fisheries Act. Chlorine will not be used in the de-inking process, and, therefore, formation of organo-chlorine compounds will not take place.

Of the chemicals used in the process, sodium hydroxide, sulphuric acid and hydrogen peroxide are regulated under the Transportation of Dangerous Goods Regulation. Both caustic and sulphuric acid solutions are regulated as corrosive and environmentally hazardous substances (class 8 and 9.2), while peroxide is an oxidizer (class 5.1). The pH of the waste stream indicates that if these substances are still present in the waste stream, they are so diluted that they no longer meet the criteria for the primary classification, and thus, the effluent would not be considered as special waste.

Based on the anticipated characteristics of the waste stream, the effluent would not qualify as a leachable waste with respect to metals and other substances listed in the Special Waste Regulation leachate quality criteria.

Surface water control is to be implemented through containment curbs for runoff water and through spill control walls to contain 125 percent of potentially spilled material. Clean runoff from roofs and non-containment areas are to be segregated and discharged directly to the Fraser River. No groundwater is to be used.

II.5 Air Emissions

Air emissions from the plant will be primarily water vapour, and will therefore not require treatment for the abatement of smoke or particulate emission. The plant will include an on-site power boiler fueled by natural gas, with Number 2 fuel oil as an emergency stand-by fuel. The gas burner for the boiler will be selected to meet Level A control objectives for the forest products industry of British Columbia. As noted in section VI, Newstech must ensure that all air emissions from the plant meet the requirements of the GVRD.

II.6 Solid Wastes

The waste residue requiring disposal or further recycling will amount to 15,400 air dry metric tons per annum, 2,400 metric tons of which is non-burnable rejects, such as staples, paper clips, glass and plastics. It is proposed by Newstech that rejects be landfilled and that the balance of the solid waste ultimately be recycled through a composting program. However, until the composting program has been tested and found acceptable on a pilot scale with full monitoring for dioxins and metals, all solid wastes are proposed to be landfilled. Information from other pilot scale composting facilities is to be used as the basis for design and testing of the composting trials at Newstech.

II.7 Noise

Newstech's operations are not expected to result in any increase in overall noise level in the plant area. Locomotive engines will be the source of the highest noise level emissions associated with the plant. Locomotives already using these rail spurs generate a sound level comparable to that projected for engines serving Newstech operations.

II.8 Fish and Wildlife Impacts

Wildlife impacts are considered to be minimal because of this site's long history as an industrial property. No negative impacts on fish habitat in Nelson Creek are anticipated.

II.9 Environmental Regulation

Environmental regulation of this project is primarily the responsibility of the GVRD. Liquid waste is to be regulated through the terms and conditions of a permit for discharge to sanitary sewer, and air emissions through the terms and conditions of an air emission permit. Solid waste disposal is to be regulated through pertinent federal, provincial and regional regulations.

III. THE MAJOR PROJECT REVIEW PROCESS

On April 26, 1990, Newstech formally submitted its Prospectus to the MPSC for review under the MPRP, which applies to major industrial projects such as Newstech's proposed de-inking facility. The MPSC is comprised of senior government officials from the Ministry of Environment, Ministry of Regional and Economic Development, Ministry of Forests, Ministry of Municipal Affairs, Recreation and Culture, Ministry of Energy, Mines and Petroleum Resources, Environment Canada and the Federal Environmental Assessment and Review Office. As a result of its permitting responsibilities for the Newstech project, the GVRD was also represented on the MPSC for the project's review. (Further information on the MPRP and MPSC is contained in the MPRP Guidelines.)

Also on April 26, 1990, Newstech placed legal notices in the Vancouver Province, Vancouver Sun and Tri-City News inviting the public to submit written comments on the Prospectus to the MPSC by May 26, 1990. The legal notices also notified the public that the Prospectus could be viewed at public libraries located in Coquitlam, Delta, Burnaby, Vancouver, New Westminster, Port Coquitlam, Richmond and Surrey.

In addition to the copies of the Prospectus that were distributed to public libraries, copies were also sent to the West Coast Environmental Law Association, the Society Promoting Environmental Conservation, the Greenpeace Foundation of Canada, the Health Action Network Society, and the British Columbia Medical Association for their review.

Concurrent with the public's review, all levels of government were evaluating Newstech's Prospectus. Appropriate federal, provincial, regional and municipal agencies were provided with copies of Newstech's Prospectus for their comments.

As part of the review of this project, several provincial officials and GVRD staff visited the Smurfit Newsprint Company newsprint de-inking operation in Portland, Oregon. GVRD staff also visited the Quebec and Ontario Paper Company newsprint de-inking operation in Thorold, Ontario.

The MPSC met several times in June and July, 1990, to review comments on Newstech's Prospectus from both the public and government agencies. On July 18, 1990, the company was formally notified by the MPSC that Approval-in-Principle would be granted, subject to the company agreeing to eight conditions (listed below).

The company responded positively to all eight conditions on July 23, 1990. On this basis, formal Approval-in-Principle was granted to Newstech's project on August 3, 1990.

IV. SUMMARY OF PUBLIC COMMENTS

Twelve submissions on the Newstech Prospectus were received from the public. Public concerns focussed on the disposal and potential toxicity of the solid waste and effluent discharge.

In addition, many of the public comments expressed complaints about the review process. Many thought that public hearings should be held prior to the project receiving Approval-in-Principle. Other common complaints were that there was insufficient time to review the Prospectus and the request for public comments was not well advertised. While none of these process-related comments have been specifically dealt with in this report, they have been noted by the MPSC. The MPSC is currently reviewing these concerns and considering some changes to its public consultation process.

IV.1 Potential Toxicity of the Solid Waste

Concern about the toxicity of the solid waste was cited in several submissions from the public. The MPSC is satisfied that the solid waste from the process will not be a toxic or hazardous waste. While there is potential for contamination of the solid waste residue from the newspaper ink and from chemicals used in the de-inking process, the MPSC notes that there has been a steady movement away from mineral oils in inks to biodegradable vegetable oils. Furthermore, other de-inking facilities in Canada, the U.S. and Europe have not experienced problems with toxicity of solid wastes. In fact, several of these operations are presently using or testing their solid waste for land topdressing and compost.

To ensure that toxic substances are not introduced into the de-inking process, Newstech has proposed a strict quality control program for monitoring and testing of old newspaper and magazine samples. The MPSC endorses this proposal and has recommended a government/company/academic committee be established for overseeing the monitoring program. The results of this program are to be made available to the public, upon request.

IV.2 Disposal of the Solid Waste

Several public comments expressed opposition to landfilling the solid waste, particularly at the GVRD's landfill at Cache Creek.

The MPSC notes that Newstech has requested landfilling for a period of only three years, while it conducts tests on the solid waste for possible use in composting or land topdressing. The MPSC believes that composting is a viable possibility based on its discussions with Smurfit Newsprint in Oregon and Quebec and Ontario Paper Company in Ontario. The MPSC further notes that the GVRD is prepared to accept solid waste from the Newstech plant for a period of up to three years.

In terms of where the solid waste is to be disposed, this will be determined by the GVRD as it is responsible for the disposal of municipal solid wastes in the Greater Vancouver Regional District. However, the solid waste cannot and will not be disposed of at Cache Creek due to the existing provincial waste management permit conditions for this site.

It should be understood that although the GVRD will accommodate disposal of the sludge for the first three years of the plant's operation, the sludge will only be accepted if tests, which will be conducted on a regular basis under Newstech's monitoring program, confirm that it is not a special waste.

IV.3 Newstech's Need to Import Raw Material

Another concern raised was the issue of Newstech having to import up to one-half of its old newspapers.

In its Prospectus, Newstech states that its raw material sourcing policy will emphasize British Columbia and Alberta. Newstech intends to provide a market for old newspapers and magazines on an F.O.B. shipping point basis throughout British Columbia and Alberta at all times. All recycling initiatives in British Columbia and Alberta which collect old newspapers and magazines will have the option of selling to Newstech on a shipping point basis, should they wish to do so.

The Prospectus also states that "Newstech's primary sourcing objective for raw materials will be to work with the GVRD, its member municipalities and the local collection and recycling community...".

The MPSC believes that it is in Newstech's best corporate interest to obtain old newspapers and magazines from locations closest to its operation. Newstech's plans to source old newspapers and magazines from outside the province are due to the relative shortage of available supply in British Columbia compared to the requirements of an economically viable

de-inking facility. The importing of old newspapers from the U.S. is unlikely, as two more de-inking plants are under construction or being proposed in the State of Washington.

IV.4 Monitoring of Inks in Raw Materials

Several submissions expressed concern that Newstech's plant would result in the importation of toxic inks from other jurisdictions.

This issue was also raised by the Ministry of Environment in the early stages of its review of Newstech's project. In response to this concern, Newstech has indicated that it will have stringent raw material standards and receiving procedures to ensure that it is dealing with known raw materials. Effective management of Newstech's incoming raw material supply is critical not only to the effective environmental monitoring of the process, but also to the fiscal effectiveness of its operation. In addition to monitoring for environmentally unacceptable contaminants, Newstech has indicated that it will also be closely inspecting incoming raw material for such variables as moisture content, the content of kraft papers and the absence of plastics.

Details on the quality control procedures proposed by Newstech are outlined in a letter to Mr. David Parsons, MPRP Coordinator, Ministry of Environment, dated June 15, 1990 (included in Appendix 4).

IV.5 Potential Toxicity of the Effluent Discharge

Several submissions expressed concern about the potential for toxic substances to be discharged into the Fraser River.

Newstech's original proposal was to dispose of its wastewater to the GVRD sewer following primary clarification and biological oxidation in an aeration tank. The Prospectus states that the proposed treatment will achieve effluent contaminant levels 20 percent below the proposed Regional Sewer Use Bylaw limits of 600 ppm TSS and 500 ppm BOD, and that toxicity of the effluent will be at or below the level in the GVRD interceptor to which the company will connect.

After reviewing Newstech's proposed treatment, the GVRD has recommended that only effluent treated by full secondary treatment, including secondary clarification,

be accepted. Furthermore, it also recommended that the toxicity of Newstech's effluent be monitored on a strict schedule and be part of their permit requirements. With full secondary treatment and control of the toxicity of process additives, Newstech should be able to achieve satisfactory toxicity levels (i.e. the 96hLC50 at 100 percent concentration). The MPSC concurs with the GVRD's recommendations, and has included these as conditions for its Approval-in-Principle. The conditions have been accepted by Newstech.

IV.6 Odours

Another issue that was raised by several government agencies and the public was the possibility of odours as a result of this operation. The MPSC agrees that there would be a problem with odours if the secondary treatment lacks adequate oxygenation. Improper composting or storage of the sludge could lead to odours. However, this is an issue which can be addressed in the permitting process. All sources of odours will be covered under permitting by the GVRD.

V. SUMMARY OF GOVERNMENT AGENCY COMMENTS

A summary of each of the submitted government agency comments is provided below. Note that complete agency comments are attached as Appendix 3.

Ministry of Regional and Economic Development

The Ministry of Regional and Economic Development supports the establishment of a newsprint de-inking plant in British Columbia, such as the one proposed by Newstech. As a result of new requirements for recycled fibre content in newsprint in the United States, British Columbia's newsprint manufacturers will soon have to use some recycled newsprint furnish in order to maintain their market share.

Ministry of Environment

The Ministry of Environment proposes the following conditions be committed to by the proponent before Approval in Principle is issued:

1. Preparation and submission of an Emergency Response Plan for spills of hazardous chemicals and for safeguards and procedures for use during plant startup or upset conditions.

2. A commitment to undertake testing and monitoring of sludge to ensure that sources of heavy metals or toxic substances do not enter the de-inking process. Plans for the sorting or pre-processing of inputs to the plant should be outlined.

3. A commitment to undertake pilot studies for composting or land topdressing of sludge, and report results to a review committee.

4. A commitment to notify the GVRD and the Regional Waste Manager of the Ministry of Environment if any alternate chemicals are to be tested or used in the flotation process.

A commitment to these conditions has been received from Newstech.

Ministry of Municipal Affairs, Recreation and Culture

The Ministry of Municipal Affairs, Recreation and Culture wishes to ensure the requirements of the Heritage Conservation Act are met with regard to the possible uncovering of archaeological remains. This can be adequately addressed during project permitting. As a result, the Ministry endorses the granting of Approval-in-Principle at the end of the Prospectus review, subject to the company agreeing to inspection of the plant site to ensure that archaeological resources are not inadvertently disturbed.

Ministry of Forests

The Ministry of Forests has indicated that it does not have major concerns with Newstech's project. Because of impending legislation in the U.S. regarding the use of recycled fibre in paper products, particularly in newspapers, the Ministry is of the view that it is essential that a viable recycling plant be established in British Columbia. However, the Ministry also notes that Newstech will have to overcome concerns regarding toxic ink in the solid waste and the volume of solid waste. These issues have been addressed.

Ministry of Energy, Mines and Petroleum Resources

The Ministry of Energy, Mines and Petroleum Resources has no comments.

Ministry of Advanced Education, Training and Technology

The Ministry of Advanced Education, Training and Technology support an economically viable and environmentally sound newsprint de-inking plant in British Columbia. With regard to Newstech's proposed plant, the Ministry expressed concerns regarding the use of best available technology, interaction between the company and universities and availability of old newspapers. These issues have been addressed.

Ministry of Crown Lands

The Ministry of Crown Lands states that there are no Land Act tenuring implications associated with this project.

Ministry of Government Management Services (Purchasing Commission)

The Purchasing Commission has no objections to Newstech's proposed procurement methods for the planned de-inking facility. Purchasing Commission staff have

already met with the proponent and will continue to meet with the proponent to discuss supplier development initiatives.

Ministry of Health

The Ministry of Health is concerned about the quantity of particulates that would be discharged from the roof exhausts. This issue has been addressed.

Ministry of Native Affairs

The Ministry of Native Affairs notes that the plant is located within the comprehensive land claim of the Musqueam Indian Band. They suggest that Newstech provide surrounding Bands and Tribal Councils the opportunity to outline any concerns. Heritage resource protection and employment for Natives should also be addressed.

Ministry of Parks

The Ministry of Parks has no comments on Newstech's proposal.

Ministry of Social Services and Housing

The Ministry of Social Services and Housing has no objections to Approval-in-Principle being granted at the end of the Prospectus review. It is recommended that Ministry clients have the opportunity to compete for available jobs, and that the Ministry's area manager be contacted to discuss hiring procedures.

Ministry of Tourism

The Ministry of Tourism has expressed concerns regarding the release of toxic chemicals and wastes during flooding and earthquakes, the generation of offensive odors, and the disposal of solid waste. These issues have been addressed.

Ministry of Transportation and Highways

The Ministry of Transportation and Highways found no conflict areas from the point of view of future ministry transport improvement strategies.

Environment Canada

Environment Canada has no objection to the project proceeding, provided that their concerns regarding site contamination, effluent discharge and solid waste handling are addressed, either as a requirement of

obtaining the appropriate permits or as a reportable condition of a permit. Newstech has agreed to proposed requirements.

Greater Vancouver Regional District

The GVRD will accept into it's sewers only plant effluent subjected to full secondary treatment, including secondary clarification. The toxicity of Newstech's effluent must be monitored on a strict schedule and be part of their permit requirements. Newstech must make best efforts to control the quality and composition of the old newspapers and magazines that constitute incoming raw material. Permit metal levels will be set lower than the proposed Regional Sewer Use Bylaw limits.

With respect to air emissions, the GVRD identified potential odour problems from the proposed aeration lagoon and a very high rate of air discharge from the roof exhaust system. Both of these sources of emissions will be permitted, and specific criteria will be imposed on flow, contaminants and odour.

The projected rate of discharge from the roof exhausts is unusually large and general plant ventilation would not result in this emission rate.

The GVRD will only accept the resultant solid waste from the plant for a maximum period of three years, at a designated disposal site and at prevailing disposal fees. This will give Newstech three years to prove-out a composting system to minimize solid waste disposal in landfills.

Conditional on the proponent providing an adequate response to their comments pertaining to sanitary sewer discharges, air emissions, and solid waste disposal, including indications of the steps to be taken to address the issues raised in the review of the Prospectus, the GVRD does not oppose giving the project Approval-in-Principle and proceeding with project permitting. The GVRD's review indicated that there are no major issues that cannot be addressed or resolved as part of project permitting. Newstech has agreed to proposed requirements.

City of Vancouver

The City of Vancouver deferred comment to the GVRD.

The District of Burnaby

The District of Burnaby expressed concerns regarding old newspaper supply, solid and liquid waste disposal, impact on water quality, preparedness for chemical spills and earthquakes and composition of inks in the raw material. These issues have been addressed.

City of New Westminster

The City of New Westminster is concerned about the amount of newsprint that would be imported and the resulting sludge that will be landfilled. The City of New Westminster does not support the Newstech project.

District of Coquitlam

The District of Coquitlam has not formally advised the MPSC of its position, but it recently gave third reading to a zoning bylaw for the proposed site. Fourth reading will not be given until MPSC Approval-in-Principle has been received.

Fraser River Estuary Management Program

It is the MPSC's understanding that the Fraser River Estuary Management Program has no objections to Newstech's project provided that the nature of the materials to be shipped over the dock remains as specified by the company. Any change in the nature of materials shipped will require prior FREMP approval.

VI. MAJOR PROJECT STEERING COMMITTEE REVIEW AND DECISION

During June and July, 1990, the MPSC carefully reviewed all submissions received from the public and government agencies. It determined that a number of important issues had been identified, but felt that these could be addressed by requiring Newstech to revise some of the environmental protection measures proposed, and by requiring the proponent to undertake additional protective measures. Therefore, the MPSC has decided that Newstech should be granted Approval-in-Principle subject to the company agreeing to meet the following eight conditions:

1. **MONITORING COMMITTEE**

   A Monitoring Committee, chaired by GVRD, will be formed to establish and oversee a monitoring and research program to be carried out by Newstech Recycling Inc. The monitoring program will provide for the sampling and testing of sludge, liquid effluents, source materials (for suitability) and selected process additives. The research program will provide for pilot studies for composting or land topdressing of the sludge. The provision of funding for the monitoring and research program will be the responsibility of Newstech.

2. **SLUDGE DISPOSAL**

   Newstech will undertake pilot studies on composting of the sludge and will also pursue the option of disposal of the sludge as a top dressing to land. These activities will be undertaken in cooperation with the Monitoring Committee. The amount of sludge disposed to landfill must be reduced as soon as alternatives are proven acceptable. Sludge disposal to landfill will not be permitted beyond three years.

3. **EFFLUENT TREATMENT AND DISCHARGE**

   All process water will be treated in a primary clarifier, secondary treatment facility (activated sludge) and a secondary clarifier before release to the GVRD sewer.

   The effluent discharge will be required to meet GVRD's sewer use requirements and the levels of BOD, suspended solids, and toxicity of the Pulp

and Paper Regulations under the federal Fisheries Act.

4. **EMERGENCY RESPONSE PLAN**

Prior to startup, Newstech will provide the Monitoring Committee with an Emergency Response Plan for potential spills of hazardous chemicals and for safeguards and procedures to be used during plant startup or upset conditions. The plan must provide assurance of adequate containment of spills to prevent discharge to the GVRD sewer system or to the Fraser River. A satisfactory program for training and testing of emergency response staff must be designed and implemented.

5. **AIR QUALITY**

Newstech will ensure that all air emissions from the plant meet the requirements of the GVRD.

6. **FLOTATION PROCESS**

Newstech will provide prior notice to the GVRD and the Regional Waste Manager of the Ministry of Environment if any alternate chemical is to be tested or used in the flotation process.

7. **SITE CONTAMINATION TESTING**

Newstech will undertake testing of soil and water on the plant site for contaminants, specifically chlorophenates, and will take remedial action, as required by the federal Department of Environment, in order to prevent the leaching or runoff of contaminated material into the Fraser River.

8. **ARCHAEOLOGY**

Newstech must ensure that archaeological resources protected under the Heritage Conservation Act are not inadvertently disturbed. Bore holes are to be interpreted for archaeological resource potential by a qualified archaeologist prior to construction activity. If archaeological remains are uncovered during construction (eg. human remains), Newstech should stop work and contact the Archaeology and Outdoor Recreation Branch.

The above conditions address all the major technical concerns raised by the public and government agencies. For this reason, the MPSC agreed to offer a conditional

Approval-in-Principle rather than require Newstech to proceed through further stages in the MPRP.

These conditions are in addition to any commitments made by Newstech, or Hipp Engineering, in its project Prospectus, and in subsequent communications with the MPSC and/or government agencies. (This specifically includes, but is not limited to, the correspondence from Mr. P. Hipp to Mr. D. Dryden dated July 17, 1990 and the letter from Mr. S. Belkin to Mr. D. Parsons dated June 15, 1990.)

The responsibility for monitoring possible impacts from the waste streams is shared jointly by the federal Department of Environment and the provincial Ministry of Environment. The Monitoring Committee, to be convened by Newstech and chaired by the GVRD, will coordinate its activities with these levels of government. Air, water and solid waste streams will be monitored by Newstech and the Monitoring Committee will be responsible for establishing testing protocol and for evaluating test results of the monitoring process carried out by Newstech.

As a result of receiving Approval-in-Principle from the MPSC, Newstech may now finalize permitting and licensing of their project with the appropriate government agencies. Where necessary, the above eight conditions will be written into Newstech's permits.

VI.1 OTHER RECOMMENDED ACTIONS

Other issues were raised that are not conditions of the Approval-in-Principle, but which the MPSC believes Newstech should address.

The MPSC recommends that Newstech consult with B.C. Hydro in order to ensure that energy efficient equipment and procedures are incorporated into plant design and operation.

The MPSC recommends that Newstech consult with the Ministry of Social Services and Housing in regards to hiring procedures.

The MPSC recommends that Newstech hire an archaeologist to interpret the bore holes (referred to in condition 8) as soon as possible. This will minimize the possibility of future delays as a result of this requirement.

APPENDIX 1

Newstech Public Notice

Ref: 1447/1480

NEWSTECH RECYCLING INC.

Newstech Recycling Inc. is proposing to undertake the construction and operation of a recycling facility in Coquitlam, British Columbia. The proposed facility would process 140,000 tonnes per annum of old newspapers and magazines into 122,500 tonnes per annum of recycled fibre suitable as a replacement for virgin fibre in the manufacture of newsprint.

The project is expected to create a local market for old newspaper and magazines collected from recycling programs throughout British Columbia and Alberta and is expected to establish the use of post consumer waste paper in the manufacture of newsprint in British Columbia.

Newstech's proposed recycling plant is being reviewed under the Provincial Government's Major Project Review Process (MPRP). In accordance with the MPRP Guidelines, Newstech has submitted a prospectus document which provides an overview of the project, and addresses the potential environmental and socioeconomic impacts of the project. As required by the MPRP, the submitted Prospectus is a public document, and will be made available for public viewing at the following libraries:

1. District of Coquitlam
   —Lincoln Branch, 3020 Lincoln, Coquitlam
   —Poirier Branch, 575 Poirier, Coquitlam
2. Municipality of Delta
   —Delta Pioneer Library, 4683 51st Street, Ladner
   —George Mackie Centennial Library, 8440 — 112th Street, Delta
   —South Delta Library, 1321A 56th Street, Tsawwassen
3. District of Burnaby
   —Kingsway Branch, 7252 Kingsway, Burnaby
   —McGill Branch, 4580 Pandora, Burnaby
   —Central Park Branch, M35 4277 Kingsway, Burnaby
   —Cameron Branch, 9523 Cameron, Burnaby
4. City of Vancouver
   —Vancouver Public Library, 750 Burrard Street, Vancouver
5. City of New Westminster
   —716 6th Avenue, New Westminster
6. City of Port Coquitlam
   —Terry Fox Library, 2470 Mary Hill, Port Coquitlam
7. Municipality of Richmond
   —Brighouse Centre Library, 7691 Minoru Gate, Richmond
   —Sealair Library, 4004 Francis, Richmond
   —Shellmont Library, 166 11090 Williams, Richmond
   —Steveston Library, 3811 Chatham, Richmond
8. Municipality of Surrey
   —Cloverdale Branch, 5642 176A Street, Cloverdale
   —Guildford Library, 15105 105th Avenue, Surrey
   —Newton Branch, 13742 72nd Avenue, Surrey
   —Ocean Park Branch, 12854 17th Avenue, Surrey
   —Port Kells Branch, 18885 88th Avenue, Surrey
   —Whalley Branch, 10347 135th Street, Surrey

The public is invited to submit comments on the Prospectus document by May 25th, 1990. Comments should be submitted to both:

Major Project Review Process Coordinator, Regional Planning and Infrastructure Branch, Ministry of Regional and Economic Development, 4th Floor, 712 Yates Street, Victoria, British Columbia, V8V 1X5.

and,

Newstech Recycling Inc., c/o Mr. Stuart Belkin, Suite 1550, Marine Building, 355 Burrard Street, Vancouver, British Columbia, V6C 2G8.

Following the review of this Prospectus by the public and by local, provincial and federal government agencies, the Major Project Steering Committee will make a decision as to whether the project will receive approval in principle and proceed to permitting and licensing, or be subject to further review.

APPENDIX 2

Public Comments

Newstech #1

Citizens Action Network

3091 West Broadway #203, Vancouver BC V6K 2G9 737 0691/732 6952

Mr. Derek Griffin, MPRP Co-ordinator,
Ministry of Regional and Economic Development,
712 Yates Street, Victoria, B.C.
V8V 1X5

Telephone: 387 0244 (office) / 356 8212/9257 (Fax)

May 25th 1990

Dear Mr. Griffin,

Further to our telephone conversation of today, I wish to communicate unequivocally our concern about the time limit available for us and other environmental groups to make representation to the MPRP Steering Committee on the newsprint deinking plant proposed by Newstech Recycling Inc. for the Coquitlam area.

Along with many other environmental groups, we only became aware of the Major Projects Review Process this week, when we were invited literally at the last minute, to a meeting with Mr. Stuart Belkin of Newstech. At that time we had received neither the company's Prospectus nor an outline of the MPRP process. Yet we learned that the deadline for submissions is this weekend — hardly enough time for a considered reply, even if we were to receive the material today.

The Newstech deinking plant proposal is indeed a major one. It will impact the environment of the Fraser River, and affect the recycling programs of all municipalities in the Lower Mainland. It could result in the importation of newsprint from as far away as Manitoba and the western United States. Surely such a project requires full public input and co-operation — yet the MPRP to date does not seem to have resulted in this.

Along with other groups, we require at least two weeks to be able to respond in a meaningful manner to the call for public input. Therefore there must be an immediate extension of the existing MPRP deadline. Further, we believe that properly-advertised public hearings should be held in all the communities affected, and not just in the immediate vicinity of the plant. Notices of the call for input and of any public meetings should also go out to all members of the GVRD Recycling Committee; to members of the Recycling Council of BC; and to the groups of the BC Environmental Network.

We hope that you can accomodate this urgent request,

Yours sincerely,

Stuart Hertzog,
for Citizens Action Network

[NewsTech Griffin 1]

Newstech # 1A

Citizens Action Network

3091 West Broadway #203, Vancouver BC V6K 2G9 737 0691/732 6952

Mr. Derek Griffin, MPRP Co-ordinator,
Ministry of Regional and Economic Development,
712 Yates Street, Victoria, B.C.
V8V 1X5

Telephone: 387 0244 (office) / 356 8212/9257 (Fax)

World Environment Day — June 5th1990

To: Members of the MPRP Steering Committee
Re: Newstech Inc. Deinking Plant Proposed for Coquitlam

Further to our letter of May 25th, we would like to stress that we are concerned about many aspects of this proposal. Our study of the company's Prospectus has revealed major inadequacies and inconsistencies, many of which leave serious doubts as to the environmental suitability of the project as presently described.

We also have major concerns about the impact of this project on existing and future GVRD Waste Management systems, particularly sewage and solid waste disposal. We also are unhappy with the way the Major Project Review Process has worked in this instance, and about the legislative implications of this approach.

We would like to stress that we are at this time not opposed to this proposal, nor do we endorse it. Like yourselves, we are in the middle of an evaluation process. In doing so, we are encountering questions and inconsistencies in the Prospectus, that must be answered before we can come to a decision.

Thus we urge the MPRP Steering Committee not to give Approval In Principle to this proposal at this time, but to insist that the Proponent proceed into the MPRP Stages I and II, to enable a formal Public Hearing to take place.

Thank you for the opportunity to be able to submit our comments.

Yours sincerely,

Stuart Hertzog

Stuart Hertzog and Dermot Foley,
for Citizens Action Network

[NewsTech MPRP 1]

Citizens Action Network

Concerning the Prospectus of Newstech Inc. for a Deinking Plant in Coquitlam, B.C.

CONTENTS

EXECUTIVE SUMMARY

SOLID WASTES PROPOSED 1

Volume of Solid Wastes 1
Toxicity of Solid Wastes 1
Exaggeration of Use of Less Toxic Inks 2
Toxic Implications of Colored Inks 2
Proportion of Magazine Stock Used 3
Method of Disposal of Solid Wastes 3

LIQUID WASTES PROPOSED 4

Toxicity of Liquid Wastes 4
Disposal Through GVRD Sewage System 4
Possible Impact on the Fraser River 5

OTHER ENVIRONMENTAL FACTORS 5

Direct Air Pollution 5
Indirect Air Pollution 6
Impact on Forestry 6

SCALE OF PROPOSED PLANT 6

Volume of Used Newsprint Available 6
Collection Area Proposed 7

DEFICIENCIES IN PUBLIC PROCESS 7

Inadequate Advertising 7
Difficulty of Obtaining Prospectus and Guidelines 8
Lack of Time for Response 8
Possible Circumvention of Public Hearings 8
Authority of MPRP Steering Committee 8

EXECUTIVE SUMMARY

The Prospectus leaves unanswered many questions as to the volume and toxicity of the solid sludges and waste waters, its effects on local air and water, the manner in which wastes will be disposed, the scale of the plant and the wisdom of locating it on the proposed site.

The volume of the solid wastes envisaged is of particular concern. Its toxicity is by no means established beyond doubt by the Prospectus, particularly because the Proponent exaggerates the adoption of less toxic inks and presents no convincing evidence as to the toxicity of either conventional or modern colour printing inks.

The proportion of magazine stock to be used in the process is given conflicting values and has been drastically underestimated in significant evidence offered to the Ministry of Environment for calculations affecting sludge toxicity.

The scale and location of the plant, possible direct and secondary air and water pollution and the apparent lack of earthquake and flooding planning, could place the health of local residents and the ecosystem of the Fraser River into jeopardy.

The method of disposal of both solid and liquid wastes is called into question, especially as the Proponent has a financial interest in the Cache Creek dump. The Proponent does not take into account existing recycling volumes in his claims of waste reduction, thereby considerably overstating his case.

The ability of the Proponent to secure newsprint supplies, the wide area over which he proposes to collect them and the changing ONP market, challenge the long-term economic viability of the plant. The wisdom of current efforts to secure a monopoly for the Proponent for ONP collected in B.C. is called into question.

At this time, neither the public nor government has sufficient evidence on which to be able to make a confident decision as to the environmental and economic effects of allowing the plant to proceed. Deficiencies in the Prospectus must be answered within the legal framework of a Public Hearing process.

Prepared by Stuart Hertzog and Dermot Foley for Citizens Action Network.

Vancouver, B.C.
June 6th 1990

SOLID WASTES PROPOSED

We are concerned about the volume, possible toxicity and proposed method of disposal of the solid wastes produced by the facility. We find the volume of solid wastes indicated to be alarmingly high; the possible toxicity of the inky sludges glossed over; and the method of solid waste disposal left unsettlingly vague.

Volume of Solid Wastes

More than 30,000 tonnes per year of contaminated waste, consisting of fibre, inks, assorted metals, solvents and glues, or 20% of the ONP input by weight, would be generated by the proposed plant each year. This is an alarmingly large figure, especially as the majority of the ONP will be imported into the GVRD.

The Proponent claims that only a plant of this scale can be economically viable, but we are not convinced of this. The size of the project seems to be more linked to the requirement of the Fletcher Challenge and MacMillan Bloedel coastal mills for 10% recycled content in pulp designated for the California market, than in any inherent economy of scale required for any deinking or repulping process.

We would like to see the project scaled down, to handle only ONP collected in B.C. We believe that to encourage an overall reduction in waste produced by our society, wastes should be processed in the area in which they are generated. This project will be introducing extra toxics into local waters and more tonnage into GVRD waste management facilities, without helping to achieve waste reduction.

To explain this last point: in presenting the case for a deinking plant of this size, the Proponent estimates that 46,500 tonnes /yr of recycled newsprint are available within the GVRD. In its analysis of newsprint available throughout the province, the Prospectus points out that 36,000 tonnes were recycled in BC during 1988. It is our understanding that almost all of this was collected within the GVRD.

According to the 1989 MacLaren report, 9% of all GVRD waste was at that time being recycled. Assuming that this includes the 36,000 tonnes of ONP currently recycled in the province, there are only 10,500 tonnes of additional ONP available in the GVRD. Since this plant will produce 31,900 tonnes of solid waste per year, the GVRD will receive a net gain of 21,400 tonnes of solid waste in exchange for recycling only an additional 10,500 tonnes of newspaper and magazines.

Thus, residents of the GVRD and the ecosystem of the Fraser River will be paying dearly for the fact that the pulp and paper industry of this province has refused to attach deinking facilities to any of its mills, in spite of clearly-expressed consumer demand, now reflected by current market conditions.

Toxicity of Solid Wastes

A second factor that concerns us is the possible toxicity of the solid wastes. The Prospectus suggests that the solid wastes will not be classifiable as "special" or toxic wastes. We are not at this time convinced of this, for four main reasons:

First, there is a question as to the toxicity of printing ink sludge; second, the Prospectus exaggerates the extent to which vegetable-based inks are being adopted by the printing industry; third, there is the issue of how much coloured

ink will be present in the solid waste; and fourth, there is significant inconsistency in the percentage of magazine stock the Prospectus describes will be used.

Conventional inks contain petroleum oil-based oils and solvents, all of which are highly toxic. In an article titled "Making Progress in Switch to Green Inks"by Gayle MacDonald published in *The Financial Post* February 7 1990, president of the Canadian Printing Ink Manufacturers Association Mr. Milford Tallon states that: "Solvents, which are derivatives of petroleum, are highly toxic and emit many pollutants. The printers need after-burners or other costly equipment to control emissions"

We believe that the Proponent has not satisfactorily proven the absence of toxic ink components in the solid waste sludge, nor guaranteed the absence of solvents used to remove them. The Prospectus suggests only that Carbon Black from ink is present in the sludge. This does not assuage our fears at this time.

Exaggeration of Use of Less Toxic Inks

Contrary than suggested in the Prospectus, vegetable- and water-based inks are not being adopted as rapidly as the growth in conventional color printing. These newer inks are at best capturing a small part of the printing process. Yet the Prospectus suggests that their acceptance rapidly is becoming universal.

In the same article quoted above, Mr. Tallon goes on to confirm that only 3% of all ink companies in Canada are currently using water-based inks. "A lot are talking about it, but it's still relatively new technology and printers have invested millions over the years in ovens driers and after-burners to handle the solvents emissions."

"It's going to be a long time before they switch completely over — if ever."

Mr. Tallon also suggests that even the newer inks are not entirely toxic-free. "With water-base inks many of these are eliminated, but not entirely. Very often pigments in the formulation can make an ink toxic, which means that those made out of water, soya or canola are still not suitable for food packaging".

If they are not suitable for packaging, then surely they are not suitable for food growing, as part of ink-sludge derived compost, or for incineration. Again, our concern over the toxicity of the solid wastes are not answered by the Prospectus.

Toxic Implications of Colored Inks

The presence and toxicity of coloured inks in the ONP, are nowhere discussed by the Proponent The use of coloured inks in newspapers, magazines and newsprint advertising inserts has increased dramatically in recent years, so that process colour printing is now the norm rather than the exception in the printing industry.

As mentioned above, coloured inks contain metals and other toxic substances. They are therefore more toxic than black inks. If these additional toxics are included in toxicity calculations, the solid waste may prove to be Special wastes, unfit for composting, incineration or even landfilling in GVRD facilities.

The issue of colored ink is noticeably absent from the Prospectus. The components and expected percentage of stock covered with coloured inks, must be disclosed.

Proportion of Magazine Stock Used

There is considerable inconsistency in the percentage of magazine stock to be used in the pulping process. Glossy magazines contain a much higher proportion of coloured inks, as well as clays, polymer glues and varnishes, than ONP.

In the Raw Materials summary of the Prospectus, the plant is anticipated to use 15-20% magazine stock; in the Estimates of Consumption magazines make up 20%; in the Component Solids Analysis it is estimated that magazines would comprise 20% of the raw material; while the Purchasing Standards states that magazines may constitute 25% of the packed newsprint arriving at the plant.

However, included in the Prospectus is a letter to the Proponent covering disposal of the sludge from the facility, from the head of the Special Waste Section of the provincial government Waste Management Branch for the Lower Mainland. In this letter, Louis Ouellet writes: "From the information submitted... it is noted that magazines will amount to only 10-15% of the incoming paper and that as such the metal content of the sludge is expected to be less than .1 percent."

This is a considerable underrepresentation on the part of the Proponent as to the possible contents of the solid wastes. If the .1% percent figure is based on the 10% magazine content, with a higher magazine content a more realistic estimate could be as high as .25% metal content, equivalent to 2.5 kilograms per tonne of sludge.

This serious miscalculation must be addressed.

Method of Disposal of Solid Wastes

The Prospectus suggests three methods of dealing with the solid wastes: landfill; incineration; and composting. Which one is to be used? To be able to judge the environmental impacts of a proposal, both public and government must know what is actually being proposed. The Proponent must be definite in this regard.

Because of the extra expense involved in drying the sludges, and because the only waste incinerator in the area (the GVRD facility in Burnaby) is already operating at capacity, it seems unlikely that incineration would be a viable option for sludge disposal. Neither we nor public opinion would support any suggestion of incineration of these toxic products, even if disguised as a waste-to-energy project.

At a public hearing for rezoning held May 31st in Coquitlam, the Proponent stated that his company intends to proceed with composting the waste sludges, most likely for use as landfill cover. As the Port Mann landfill is almost full and the Burns Bog facility is not available to industries outside of the city of Vancouver, the landfill most likely to receive these wastes is the GVRD Cache Creek facility.

We believe that solid wastes from the proposed plant, possibly first converted to compost, will be landfilled at Cache Creek. Thus, extra wastes originating outside the GVRD (the majority of ONP accepted by the plant) will be disposed of in GVRD facilities. This will add to the GVRD Waste Management crisis and

further compound the injustice suffered by Cache Creek residents, who must endure Lower Mainland wastes being dumped in their area.

We would remind the Steering Committee that the Proponent through his holding company Balaclava Enterprises, already owns 50% of Wastech Inc., which owns and operates the Cache Creek dump. To encourage the Proponent to compost the solid wastes from his Newstech plant for dumping at his Cache Creek dump, is neither protecting the public interest, nor is it good Waste Management practice.

LIQUID WASTES PROPOSED

Toxicity of Liquid Wastes

We would like to see a more detailed breakdown of the toxic components of the liquid wastes. Although contaminants such as chlorophenols and some heavy metals are listed, others are not. The Proponent claims that there are no dioxins present in the solid waste. Is this true? Do they go into the liquid wastes?

The toxicity of the liquid wastes is directly affected by the proportion of coloured inks and glossy magazines included in the recycled stock. As already described, neither of these factors are described with any accuracy in the Prospectus. The liquid wastes therefore could be even more toxic than the Proponent allows.

An independent study of discharge from a comparative deinking plant would be more meaningful than the basic information provided in the Prospectus. This information should be supplied by the Proponent; or better still, by a reliable and independent source. The Proponent also should be prepared to substantiate all estimates of proposed discharges. At the moment, we have no proof of any claim.

Disposal Through GVRD Sewage System

The Proponent wishes to discharge liquid wastes from the proposed plant to the GVRD sewage plant at Annacis Island. With only two clarifiers, the proposed plant will discharge unclean water into the GVRD sewage system. The Annacis Island facility is unable at present to meet existing provincial discharge permit levels, and any additional toxic loading will only compound this problem.

The presence of heavy metals from industrial sources is responsible for the failure of past GVRD experiments in commercial composting of Annacis Island sewage. Composting is desirable to mitigate Fraser River and Georgia Straight pollution. Government must insist that no new unclean effluent enters municipal sewage.

It would seem prudent to ask the Proponent to provide extra sewage treatment to be able to remove all the toxics from the discharge water, so that only clean water would be released into GVD sewers. In view of the stated intent of government to clean up the Fraser River, we suggest that waste water only comparatively better than urban street runoff, as indicated by the Proponent at the public hearing on rezoning at Coquitlam council, is not acceptable at this time.

Possible Impact on the Fraser River

No plant is 100% secure against accident or human error. Some of the chemicals that will be used by the proposed plant are extremely toxic to fish and other life forms. Sodium Hydroxide, which is known as caustic soda, and Sulphuric Acid are both corrosive to human tissue and their vapours quickly can damage the respiratory tract. Sodium Silicate also is caustic to skin and mucous membranes.

Upset discharges of chemicals to the Fraser River are therefore of concern. A chemical spill during transportation, off-loading or operation of the plant, especially if outside the plant confines, will have an adverse impact on marine life in the Fraser. There have been many recent instances of chemical spills from plants sited adjacent to a body of water making their way past containment dams.

Further, a representative of the Proponent has indicated that the proposed on-site concrete dams would be insufficient to withstand earthquake damage — an ever-present danger throughout the Lower Mainland. Earthquake planning is becoming a factor in all new proposals. It should especially be addressed for this plant.

Major flooding is also a possibility that must be taken into account in such a low-lying area. No information about 50- and 100-year flood levels was included in the Prospectus. This omission also, must be addressed.

The location of this plant immediately adjacent to the Fraser River places it into the highest-risk category. Could a more secure site not be found? — after all, the plant is not planning to draw water from the Fraser. We cannot begin to clean up the Fraser by allowing yet another chemical-based industry to site along its banks.

OTHER ENVIRONMENTAL FACTORS

Direct Air Pollution

Many BC towns are familiar with the smell of a pulp mill. Although this plant may not use the same volume of chemicals as a regular pulp mill, many of the same chemicals are used, including sulphur compounds which can create noxious odors. Emissions from tanks and ventilation of process systems is bound to cause some smell, yet this is not considered in the Proposal.

The Prospectus also states that venting of Caustic Soda and other chemicals will occur at scheduled times. Sodium Hydroxide and Sulphuric Acid vapours , even in low dosages, can damage the lungs and respiratory tract. With the low-lying site of the plant, inversion conditions can cause a buildup of these vapours.

We suggest that all possible meteorological and air pollution scenarios be considered, especially as ozone buildup from Vancouver traffic is an acknowledged problem in the area. Because the plant is not far from a residential area, worst-case scenarios must be regarded as significant.

The Fraser Valley already suffers from severe low-level pollution. To add to it with this plant does not appear to make any sense.

Indirect Air Pollution

It must not be forgotten that a plant of this size is going to create significant indirect air pollution from trucks, trains, tugs and ancillary vehicles required to supply and service it. All these vehicles are going to contribute to Fraser Valley air pollution, as well as add to traffic congestion on the highways.

Further industrialization, even in the name of supposedly environmentally-benign recycling, is not going to improve Fraser Valley air. Again, is the selection of this site wise? Is there not another location, more environmentally acceptable?

Impact on Forestry

Repeatedly, the Proponent has claimed that the plant will "save over a million trees." We reject this claim as spurious. The Prospectus states that this plant is essential for compliance with new and more rigorous environmental legislation in export markets, but the Proponent has pointed out that the plant will at full production, recycle only 6% of the pulp produced in this province.

With the continued growth in demand for newsprint and in the absence of any legislation encouraging a reduction in the consumption of newsprint, we do not see any direct connection between this plant and saving B.C. trees.

We suggest that there should be a direct connection between the Proponent's claims of saving a million trees, and a million trees actually saved. Will the forestry companies who will benefit from this plant, set aside 5% of their licensed areas, especially those containing old-growth trees, in return?

Until policies of this nature are put in place, the presence of this deinking plant will do nothing to end the rampant deforestation of this province, nor decrease the level of pollution in the Lower Mainland. It certainly is not a "green" proposal.

SCALE OF PROPOSED PLANT

Volume of Used Newsprint Available

Our concern as to the scale of the proposed plant is reinforced by Prospectus claims that ONP will be sourced from all of B.C. and Alberta, and possibly from Sakatchewan and Manitoba, as well as from the western United States.

With the development of various deinking facilities and the spread of recycled content legislation, it is not hard to anticipate that ONP is going to become an increasingly sought-after commodity. We believe that the Proponent is over-emphasizing the ease with which he can source ONP at an economic rate.

It further concerns us to hear that the GVRD intends to issue a contract to collect all the ONP collected within the GVRD, possibly for processing and sale to the Proponent. We suggest that this will not benefit the public interest. The Proponent may be seeking to tie up long-term ONP supply contracts from B.C. municipalities before the market has matured, using local processing as a lever.

We fear that once built and ONP supply contracts are in place, the plant quickly will be expanded to satisfy an ever-increasing demand for repulped ONP. We would like to see the project scaled down, plus guarantees that it will not be expanded beyond its present size — certainly, not at this site.

Collection Area Proposed

Even if the Proponent is successful in securing adequate newsprint supply from as far away as Alberta, Saskatchewan and even Manitoba, we do not see this as economically sustainable nor environmentally desirable.

We first wish to point out that with the development of an Alberta-based pulp industry, there is a strong possibility that a deinking and repulping plant will be built in that province in the near future. We believe that this would be a better solution to ONP recycling in the prairie provinces.

This plant would collect ONP from all of western Canada for processing in the already-polluted Lower Mainland. Besides involving a considerable waste of fossil fuel in transportation, this negates a basic principle of sustainable waste practices, which is that waste created in one area must be handled in that area.

Because it offers a non-solution to the problems of developing sustainability in our economic processes, our support for this proposal is less than enthusiastic.

DEFICIENCIES IN PUBLIC PROCESS

We must protest most strongly at the way in which the call for public response to the Prospectus was made and the short time we have had to make our response. Advertising for the MPRP process was inadequate; copies of the Prospectus were hard to obtain; not enough copies were circulated to interested parties; and the 30-day response period from the time advertising first appears, is too short.

We are extremely concerned about the lack of public hearings to date and the fact that this project could receive Approval In Principle without any public hearing taking place. This simply is not acceptable for a project of this scale and impact.

Inadequate Advertising

Small notices placed in the legal sections of newspapers does not, in our view, constititute adequate public notice of a call for response on a major project. Not everyone scans the legal notices each day; nor does such a notice bring out the fact that the Prospectus requires a formal response.

Commercial businesses such as Electronic and furniture stores take considerable newspaper advertising space each day to sell less than a million dollars of stock. A proposal of this scale, involving the investment of many tens of millions of dollars and impacting upon a major river ecosystem and the health of many hundreds of thousands of people, surely justifies a more substantial public information effort.

We suggest that in future, Proponents applying for MPRP approval be required to place prominent advertising in newspapers, so that the public is fully informed.

Difficulty of Obtaining Prospectus and Guidelines

It was difficult to obtain copies of the Prospectus. Placing 75 copies with local municipalities for display in libraries, does not in our view constitute accessibility for the many individuals and groups wanting to study this document in detail. The Prospectus should be available, free, on demand. A telephone number should be included in Prospectus advertising to expedite this.

Similarly, it was difficult for the public to obtain a copy of the MPRP Guidelines. We only managed to obtain one through the assistance of your Co-ordinator. Lack of knowledge about the Guidelines has left the public in a state of confusion about the Major Project Review Process. Debating the Guidelines in the Legislature would encourage public awareness of their strength and shortcomings.

At the moment, the public is completely in the dark about the Process.

Lack of Time for Response

Because only three environmental groups were informed of the project and the implications of the Major Project Review Process, we did not become aware of the need for a formal response until Wednesday, May 23rd — three days before the MPRP deadline. Many groups that should have received the Prospectus did not get it. Public information meetings were scheduled by the Proponent only on the last day of the deadline. And our request for a deadline extension was refused.

The effort to sound out public opinion on the project has been token, at best.

Possible Circumvention of Public Hearings

Among all our concerns about the Process, the one that stands out is the distinct possibility that Approval in Principle may be given for this project without any formal Public Hearing. We believe that any major project must automatically go to a full Public Hearing before any permissions can be contemplated.

In providing for an "end run" around any Public Hearing, the MPRP Guidelines have reduced the ability of the public and environmental groups to influence the industrial development of this province towards environmental sustainability.

Government by Order In Cabinet or by Cabinet-appointed Steering Committee is no improvement in democratic process. It is not "open government".

Authority of MPRP Steering Committee

The legal status of the Major Project Review Process must be examined and if approved, established by Legislation. According to a brief prepared for the British Columbia branch of the Canadian Bar Association, edited by Mr. Calvin Sandborn published May 11, 1990:

"In B.C., we do not have at present a legislated environmental review process legally enforceable with respect to all significant proposed economic activity. The Major Project Review Process (MPRP)... is a working policy of government and not legislation. ...To ensure compliance by industry with MPRP, there should be clear legislative authority for the process."

ENDS

Newstech #2

Health Action Network Society

May 25, 1990

Major Project Review Process Coordinator
Regional Planning & Infrastructure Branch
Ministry of Regional & Economic Development
4th Floor, 712 Yates Street
Victoria, BC V8V 1X5

Dear Sir:

Thank you for the opportunity to comment on your proposed project re: recycling plant construction in Coquitlam, BC. Having read the proposal, there are several questions that we would ask.

1. What will be the noise level created by this plant considering there will be roughly 20 trucks daily, locally, which will comprise only 30 percent of the total incoming recyclable material. We understand the other 70 percent will be coming in by rail?

2. In view of the fact that a large portion of the paper will be imported for recycling, how will the type and quality of ink be monitored, as some contain very toxic materials? What are the standards for the discharge of effluents? What will eventually happen to the solids that will be removed?

3. What is the history of the past performance of this company [or any affiliated company]? Have there been any violations by this company and were there any prosecutions as a result?

4. Since the plant is to be built next to the existing Wastetech plant, when in times of surplus of supply of used newsprint, will the surplus be diverted into refuse-derived fuel [RDF]?

page 2 -

#202-5262 Rumble St., Burnaby, B.C. V5J 2B5
(604) 435-0512

recycled

5. We would like to see a more detailed explanation concerning wildlife. Could you please elaborate on section 3.2.6?

6. What funding is being provided by the federal government and by the provincial government?

7. We have concerns about the process of public review. We feel that it should be more open to scrutiny by the public at large.

In closing, we would like to see the recommendations by Environment Canada made public.

Sincerely,

Thelma MacAdam

Thelma MacAdam
Environment Chairman
Health Action Network society

cc Coquitlam Council and Members
Coquitlam Now

Newstech #2A

Health Action Network Society

June 5, 1990

Major Project Review Process Coordinator
Regional Planning & Infrastructure Branch
Ministry of Regional & Economic Development
4th Floor, 712 Yates Street
Victoria, BC V8V 1X5

Dear Sir;

This is further to our letter of May 25, 1990 regarding the proposed project re: recycling and de-inking plant construction in Coquitlam.

It is imperative that public hearings be held.

As part of your mandate, you have the authority to set up public meetings. We feel that it is extremely important that a project of this magnatude be examined from every angle, by all interested parties. Because of the nature of the proposed plant, the location is of major importance. There are many potential problems that could have far-reaching effects.

Unfortunately, often when projects are done without all the basic examination being done, it is then too late to rectify should problems arise.

Sincerely,

Thelma MacAdam

Thelma MacAdam
Environment Chairman

cc Coquitlam Council and Members
Coquitlam Now
John Cashore, MLA

#202-5262 Rumble St., Burnaby, B.C. V5J 2B6
(604) 435-0512

recycled

Newstech #3

JOHN CASHORE, M.L.A.
(MAILLARDVILLE-COQUITLAM)
LEGISLATIVE BUILDINGS
VICTORIA, B.C. V8V 1X4
TELEPHONE: (604) 387-6383

LEGISLATIVE ASSEMBLY
PROVINCE OF BRITISH COLUMBIA

CONSTITUENCY OFFICE
102, 1100 AUSTIN AVENUE
COQUITLAM, B.C. V3K 3P5
TELEPHONE: (604) 937-3818

1113

ENT BRA

May 25, 1990

Major Project Review Coordinator
Regional Planning and Infrastructure Branch
Ministry of Regional Economic Development
4th Floor - 712 Yates Street
Victoria, British Columbia
V8V 1X5

Dear Sirs:

Re: Newstech Recycling Inc. - Recycled Newsprint Plant, Coquitlam B.C.

The following represents my submission, on behalf of the New Democratic Party Caucus, with respect to the proposed de-inking plant in my District in Coquitlam, B.C.

We recognize and support the importance of the establishment of a de-inking plant in the province as a first step toward newsprint recycling. However, it is essential that all environmental and economic concerns be fully addressed prior to construction of such a plant. I first raised this issue on March 19, 1990 and have enclosed a copy of my letter to The Honourable John Reynolds, Minister of Environment calling for a full review.

My comments here raise questions concerning the review process, B.C.'s recycling needs, the solid waste issues and the toxic discharges that may potentially be discharged as run-off or into the Fraser River at Annacis Island via the sewage system.

THE REVIEW PROCESS:

It is important that a project of this nature undergo full environmental and economic review prior to the commencement of construction, the letting of contracts, or the commitment of funding by the provincial government. The current process is insufficient in that it is not a public process. The review is not carried out by an independent body. There has been inadequate time for potential intervenors to make submissions and the environmental impact information provided in the Prospectus is very limited. The funding essential to make this a fair and meaningful process has not been provided for intervenors. Provision should be made for review of the technical information by independent experts.

. . ./2

We therefore recommend:

1. A full, sworn environmental impact statement be provided.

2. A full, public, independent environmental impact assessment take place with terms of reference that are sufficiently broad to investigate the full environmental and socio-economic impacts of all aspects of the proposal.

3. Funding be provided for interested participants that is sufficient to enable intervenors to obtain expert review of the proposal.

B.C.'S RECYCLING NEEDS:

A full environmental and economic review will need to examine realistic current and future levels of recycling from B.C. sources. The long term effect of one B.C. de-inking plant having a monopoly on most or all sources of newsprint in B.C. will also need to be fully examined.

We are concerned that this monopoly will have an adverse effect on small scale private and public recycling agencies who may find that, by virtue of economies of scale, they are unable to compete with Newstech. Conversely, if one or more large-scale private or public newsprint recycling plants were established in British Columbia, would the Newstech facility continue as a viable operation with the removal of its monopoly on B.C. newsprint?

It is my understanding that only about 30,000 tonnes of the 140,000 tonnes of newsprint required by the plant can be supplied by the GVRD; the rest would come from other regions, be imported, or old stocks of newsprint will be used.

If recycled newsprint needs to be supplied from outside sources or old stocks, which potentially contain different and/or more toxic inks than those from B.C. sources, we could very easily find ourselves in the position of "importing" additions to our solid waste problem or increasing pollution into the already overburdened Fraser River system. This clearly needs to be fully examined.

. . ./3

SOLID WASTES:

The initial proposals to the GVRD Water and Environment Committee indicated that about 50,000 tonnes of residue at 50% moisture content would be produced from the de-inking process. While these figures have since been substantially revised downward, the impacts on our landfill system need to be clearly addressed. Some questions:

- Will the high moisture content increase the leaching effects?
- Will the inks and other toxics removed or created by the process be safely disposed of; where and how?
- What percentage of the solid waste stream will be burned; where and how?
- Will the environmental review concerning the disposal of these substances address the actual environmental impact or will this review merely ensure that current regulations are met?
- Is the "press" method that will apparently be used to extract moisture from the wastes actually sufficient to obtain a 50% moisture reduction? One expert has commented that a cylindrical method of moisture reduction is necessary to obtain such levels, which has raised concerns in my mind over full independent and expert review of the technical processes to be used.

POTENTIAL TOXIC DISCHARGES:

It is my understanding that both the run-off and the sewer discharges from the plant may be potential sources of toxic or heavy metal discharges, and that because the plant will have enormous volumes of discharges, it is a candidate for a special order rather than the routine application of the proposed GVRD by-laws. A full environmental review will need to examine:

- What the actual run-off implications are for the Fraser River, the surrounding soils and particularly the stream running through the property, which already has exceeded chlorophenol levels according to Item 6 of the "Mitigation Statement for the Proposed Subdivision" filed under Appendix 2 of the report.

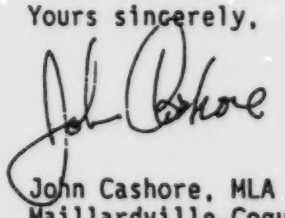
. . ./4

- The volumes of potential toxic and/or heavy metal discharges from similar de-inking plants using similar technology and similar 24-hour secondary treatment systems. It is my understanding that there are only a very few newsprint de-inking plants operating in North America and Europe; the 267 plants referred to in the report include fine paper recycling operations that have substantially less discharges. I have been informed that high arsenic levels have been a concern at some U.S. plants and that a Swedish plant that has four stages of effluent treatment, as opposed to the two proposed at this operation, is still of concern due to the discharge of nonyl phenols. A full, independent and expert comparison of the processes in use at other operations and a review of all of the potential toxins and heavy metals anticipated to be discharged by the plant, not only those set forth in the proposed GVRD by-law, would appear to be in order.

- The environmental impact of increased toxin or heavy metal load upon the already overburdened Fraser River.

In closing, I would like to propose an environmental review of this issue that is sufficiently expansive to examine the toxicity of the inks currently in use to determine whether any safer alternatives are available and whether safer chemicals or processes would therefore be available to remove these inks.

Yours sincerely,



John Cashore, MLA
Maillardville-Coquitlam
New Democratic Spokesperson,
Environment and Parks

JMC:ldi
Enclosure

Province of
British Columbia
LEGISLATIVE ASSEMBLY

JOHN CASHORE, M.L.A. (Maillardville-Coquitlam)

LEGISLATIVE BUILDINGS, VICTORIA, B.C. V8V 1X4 — (604) 387-6283

CONSTITUENCY OFFICE, #102, 1108 AUSTIN AVENUE, COQUITLAM, B.C. V3K 3P5 — (604) 937-3516

March 19, 1990

The Honourable John Reynolds
Minister of Environment
Room 112
Legislative Buildings
Victoria, British Columbia
V8V 1X4

Dear Mr. Reynolds:

I have learned that a newsprint de-inking plant is slated to begin construction in May, 1990 on the Fraser River in my district in Coquitlam, B.C., that potentially has numerous adverse environmental effects. I am therefore calling upon this government and your Ministry to ensure that a full and independent environmental review be immediately carried out.

It is my understanding that the de-inking plant will produce 50,000 metric tonnes of sludges a year, some of which could be contaminated, and that plans are yet uncertain as to whether these wastes will be landfilled or burned.

I further understand that this plant is similar in size to a small pulp mill and that it will produce massive amounts of effluent containing trace contaminants arising from the inks used in newsprint, the chemicals used to remove these inks and the chemicals contained in kraft-produced newsprint. These would include lead, copper, chromium, tin, zinc, and phenols, including PCP's and potentially dioxins. These would enter the already overloaded Fraser River via the Annacis Island sewage system.

While I recognize the importance of an de-inking plant being established in B.C. as a first step towards newsprint recycling in this province, I seriously question the wisdom of importing pollution problems into B.C., that is, into the Fraser River, and our already overburdened landfills or our air. As proposed, I understand the plant will require three to four times as much imported newsprint as can be recycled in B.C.

. . ./2

My major concerns are as follows:

1. Will there be a full environmental review of this proposal prior to commencement of construction and the letting of contracts for newsprint, or will any environmental review be an internal GVRD and/or Ministry of Environment procedure that takes place after the plant has been constructed and prior to issuing discharge permits? Will the environmental review, if any, allow full examination of whether better sites are available for such a facility and whether the company intends to use the best available pollution control technology?

2. Related to the above question is whether the Major Project Review Process announced a month ago will apply to this project and whether this process is sufficient to allow for full, independent, public review of such a facility? Will the MPRP process apply to projects that discharge into sewage systems rather than directly into waterways or are projects that fall under the jurisdiction of the GVRD or other municipalities exempt from this process?

3. By what political reasoning can a plant that adds toxic and heavy metal discharges into the Fraser River be proceeding when the GVRD currently is unable to meet its Ministry of Environment discharge permit levels for Annacis Island discharges and at such time as Mayors of municipalities within the GVRD are thrashing out a plan to reverse the trend of deterioration of the Fraser?

4. At this stage, has there yet been any independent analysis of the estimated levels of heavy metal and toxic discharges supplied by the proponent and its consultants to the Ministry of Environment and the GVRD?

5. Will environmental review of this project, if any, be sufficiently broad to fully examine such fundamental questions as whether adverse environmental effects can be avoided by requiring newsprint makers to use non-toxic, environmentally benign inks?

. . ./3

Given the questions raised in this letter and the compelling argument that, in this day and age, the prevention of future harmful environmental impacts is an absolute necessity, I am sure you will agree that full, independent public environmental review must take place prior to this project proceeding.

Yours sincerely,

John Cashore per SDB

John Cashore, MLA
Mail-Hardville-Coquitlam
New Democratic Spokesperson,
Environment and Parks

JMC:ldi

UNITED FISHERMEN AND ALLIED WORKERS' UNION

#160 - 111 VICTORIA DRIVE
VANCOUVER, B.C. V5L 4C
(Maritime Labour Centre

TELEPHONE: 255-133
TELEX: 04-5462
BENEFIT FUNDS: 255-877
FAX: 255-316

Newstech #4

May 29, 1990

Major Project Review Process
Co-ordinator
Regional Planning and Infrastructure
Branch
Ministry of Regional and Economic
Development
4th Fl. - 712 Yates St.
Victoria, B.C. V8V 1X5

Attention: Derek Griffin, Co-ordinator

Dear Sir:

Our Union, comprising about 6,000 members whose livelihood is derived by catching, transporting and processing fin fish and shell fish, is vitally affected by environmental changes to aquatic habitats. We are concerned that the proposed Newstech Recycling de-inking plant could have short and long term deleterious effects on the Fraser River estuary and adjacent Georgia Strait.

While the Fraser system remains B.C.'s major salmon producer, it is already stressed, and its riparian gone, so vital to rearing of juvenile salmon, could be put at unnecessary risk by yet another major point-source of pollutants, such as a large scale newsprint de-inking plant.

The immensity of the proposed project and its proposed location in the Fraser estuary suggest that the risk of large scale chronic toxic leaks or massive, traumatic toxic spills is great.

Although we endorse the principle of wood and fibre conservation in the interest of preserving forested watersheds, we submit that paper recycling need not and must not be conducted at the expense of fish or fish habitat.

We therefore urge that all approvals of the Newstech proposal be withheld until and unless so recommended by an independent review commissioner or panel which has conducted the following process:

1. Public Establishment of Terms of Reference

Through preliminary hearings, interested parties register as intervenors and collectively define Terms of Reference.

2. Proponent Prepares Environmental/Economic Impact Statement

Environmental, social, economic impacts of proposal are reviewed and findings distributed to intervenors in good time.

3. Impact Assessment Public Hearings

Held at times and places convenient to intervenors, and not earlier than six months after distribution of the EIS to intervenors. Witnesses under oath, subject to subpoena, examinable by all interested parties.

4. Report and Recommendations

Project approval, with or without conditions/constraints, or rejection is recommended. Reasons for recommendations, based on evidence submitted to hearings, are explained.

Yours truly,

A. Thomlinson/cff

Arnie Thomlinson
Environmental Director

AT/nk
oteu-15

copy - Municipality of Coquitlam
111 Brunette Ave.
Coquitlam, B.C. V3K 1EB

- Mr. S. Belkin
Newstech Recycling Inc.
Ste. 1550 Marine Bldg.
355 Burrard St.
Vancouver, B.C. V6C 2G8

Newstech #5

RECEIVED
JUN 04 1990
1155
REGIONAL PLANNING AND INFRASTRUCTURE DEVELOPMENT BRANCH

GREENPEACE

Major Project Review Process
Regional Planning and Infrastructure Branch
Ministry of Regional and Economic Development
4th Floor - 712 Yates Street
Victoria, B.C.
V8V 1X5

Dear Sir/Madam

Greenpeace is interested in seeing the implementation of recycling of newsprint in British Columbia. However, we have several questions regarding the specifics of the proposal by Newstech Recycling Inc. to develop a de-inking facility in Coquitlam.

1. Greenpeace is concerned about the amount of fibre lost during the de-inking and repulping of newsprint. While the waste fibre may not be suitable for newsprint manufacture, there are other applications for the short fibres created in the de-inking process. Packaging, construction materials, and disposable paper products are some uses of what is now considered 'waste'.

2 Heavy metal contamination in the solids portion of waste must be more clearly understood. The use of this material as compost must be researched in depth to understand the possible transport of heavy metals into the food chain. In this case, Greenpeace advocates the use of non-toxic, vegetable based inks in printed materials, thus eliminating a major source of heavy metal contamination.

3. Atmospheric emissions of SO2 and sulphuric acid must be reduced to lower levels than outlined in the proposal. The standards outlined are those considered acceptable for a typical pulp mill. Greenpeace feels that these standards must be made more stringent, and the construction of any new facilities must take into account that standards of atmospheric emmissions will be set at much lower levels in the near future.

4. The discharge of effluent into the GVRD sewer system is not acceptable. The facility must deal with its own waste. It is not clear at this time who is responsible for monitoring, regulating, and guaranteeing the the proper treatment of effluent at all points of discharge. The possible contamination of sewage with heavy metals, and organochlorines is a question that needs to be addressed.

5. Dioxins and organochlorines must be tested for in effluent, as they are known to be present in the raw material (newsprint & magazines). There are no safe levels of discharge of these type of toxins. Once the levels are determined to be non-detectable, monitoring for this family of chemicals could be performed on a 'spot check' basis.

Greenpeace recommends that the project planner adequately address and resolve these concerns when revising its proposal. Under the Major Project Review Process, the public must be informed and supplied with information and given adequate time to study and make recommendations to the proponents.

Greenpeace is hopeful this project will go ahead, and that our concerns can be dealt with.

Brian Killeen
Greenpeace Canada

ATTN D GRIFFIN FAX # 356-9275

Newsteel #6

1225

SHUSWAP THOMPSON ORGANIC PRODUCERS ASSO.
Box 219.
Savona, B.C. V0K 2J0
June 11, 1990

Major Project Review Process Steering Committee
Ministry of Regional and Economic Development
4th Fl. 712 Yates Street
Victoria, B.C. V8V 1X5

ATT: Derek Griffin, Co-ordinator

RE: Proposed De-inking Plant for Coquitlam

Dear Steering Committee Members,

We apologise for the tardiness of our comments, but we have just received information regarding this proposal.

We are extremely concerned about the suitability of the sludge produced by this process for use as a soil amendment, since the proponent has indicated an interest in composting the sludge.

We need to know the composition of all soil amendments used by our members, since the use of any soil amendment containing toxic contaminants is prohibited by sustainable agriculture associations.

Our other concerns include the scale of the plant, the volume of sludge and waste water, and the proponent's interest in the Cache Creek dump (which used to be an agricultural lease).

We hope you will require this proposal to proceed to Stages I and II of the MPRP so that all the information will be available at a full public hearing.

Thank you for your attention.

Yours truly,

SHUSWAP THOMPSON ORGANIC PRODUCERS ASSO.

Jerrie Gosnell

G. Gosnell

ATTN: D. GRIFFIN FAX # 3569275

Newstech #7

1224

THOMPSON WATERSHED COALITION
Box 1053
Kamloops, B. C. V2C 6H2

Major Project Review Process
Ministry of Regional and Economic Development
4th Floor 712 Yates Street
Victoria, B. C. V8V 1X5

ATTENTION: Derek Griffin, Co-ordinator

RE: Newsprint De-inking Plant
Proposed for Coquitlam

Dear Members of the MPRP Steering Committee,

The Thompson Watershed Coalition is extremely concerned about the environmental soundness of this proposal, the huge volume of paper to be processed which calls into question the compatibility of this mega-project with the concept of sustainable development (what percentage of the product will be used for advertising flyers?), the unanswered questions raised by the proponent's prospectus especially regarding the final destination of the sludge, and the business links between the proponent and Wastech, operator of the GVRD landfill at Cache Creek.

Most residents in the Interior are opposed to the interregional transport of garbage, and do not want to see this area become a dumping ground for heavily populated industrial and urban areas under the guise of economic development.

We note the failure of government to legislate a meaningful public process regarding environmental issues, and we hope the MPRP will not turn out to be another sham. We therefore request that you require the proponent to proceed to MPRP Stages I and II so that there will be a formal public hearing, where all pertinent information is brought forward by the proponent.

We regret the lateness of our comments, but no Interior groups were notified of this proposal until late last week.

Thank you for your attention.

Yours truly,

THOMPSON WATERSHED COALITION

Paula Rubinson

cc: Nelson Riis, MP Bud Smith, MLA Claude Richmond, MLA

Newstech #8 June 6, 1990

Major Project Review Process
Min. of Regional & Economic Development
4th floor, 912 Yates St.
Victoria, B.C. V8V 1X5

1230 1G
BR

Dear Derek Griffin, Coordinator:

With reference to the proposal by Newstech Recycling for a newspaper recycling plant in Coquitlam, I wish to request that your group hold public hearings on that matter so that the public is able to be fully informed about all aspects of said project.

I am specifically concerned that Newstech will use their ties with Wastech to begin shipment of large quantities of ink sludge or compost to the Cache Creek landfill without adequate public awareness or input about the consequences of such an action.

Thank you,

John McNamer

John McNamer
RR#1
Cache Creek, B.C.
V0K 1H0

NELSON A. RIIS, M.P.
Kamloops
NDP House Leader

HOUSE OF COMMONS
CHAMBRE DES COMMUNES
OTTAWA, CANADA, K1A 0A6
Phone: (613) 995-8931
Fax: (613) 996-0247

1254

BR:

1-219 Victoria St.
Kamloops, B.C. V2C 2A1
Phone: (604) 374-1714
Zenith #: 2557

OTTAWA
JUNE 12, 1990

Newstech #9

Major Project Review Process
Ministry of Regional and Economic Development
Victoria, B.C. V8V 1X5

Fax # (604) 356.9275

ATTENTION: DEREK GRIFFIN, CO-ORDINATOR

RE: NEWSPRINT DE-INKING PLANT PROPOSED FOR COQUITLAM

Dear Steering Committee Members:

I wish to add my support to the growing voices calling for full public hearings on the proposed de-inking plant of Newstech Inc.

Serious concerns have been raised by a number of groups regarding the Prospectus issued by Newstech. For example, the destination of the waste sludge, its toxicity and volume, and the importation of used newsprint which will necessitate a much larger plant than one dedicated to recycling regional waste are concerns to be answered before any plant is built. There may be more issues to be addressed which will not surface until further studies are done.

Therefore, I ask that approval in principle not be given to Newstech's proposal at this time, but that the next formal steps of the Review Process be entered into until all questions of environmental and public safety are answered satisfactorily.

Yours sincerely,

NELSON A. RIIS, M.P.
Kamloops Riding

ENV: w m

Newstech #10

June 9/90

Major Projects Review Process
Ministry of Regional and Economic Devl
4th Floor
712 Yates St.
Victoria, B.C.
V8V 1X5

Dear Mr. Griffen:

Re: Processed Newspaper Recycling Plant by NewsTech. Recyclying Inc. in Coquitlam.

On behalf of Cache Creek and Area Residents United (C.C.A.R.U) we are requesting that a full Public Hearing by the Major Projects Review Process be held on the above project. In view of public interest and concern we feel that we should also know what this proposal is about and how it will affect our area. We are very much concerned that the sludge will be coming to the Cache Creek - G.V.R.D. land fill. We feel that this will be another means for the G.V.R.D. to rid itself of a problem by sending it else where. Thank you.

Maria Russell Martin
Box 764
Ashcroft, BC.
V0K 1A0.

FAX 356-9275

Newsletter #11

[illegible]
[illegible] B.C.
[illegible]

[illegible]
Regional Planning and Development Dept.
[illegible]
[illegible] B.C. [illegible]

RECEIVED
JUN 13 1990
1251
REGIONAL & RESOURCE
DEVELOPMENT BRANCH

Dear [illegible]

I am writing to express my concern about the proposed [illegible] incinerator and how it will affect the environment and how it will affect my family and my neighbours.

I attended the public hearing in [illegible] and I was very disappointed that the concept of burning [illegible] was not rejected, as how many [illegible] that [illegible] at all the expense of [illegible] when the [illegible] is [illegible]. I am also very concerned about further pollution [illegible] at the [illegible] and the effects it will have on our health.

The public must be fully informed of all information relating to the [illegible] and be able to participate in every way possible by way of public hearings, which is [illegible]. This is a [illegible] opportunity to [illegible] to establish a reputable [illegible] and [illegible]

and creditable. You will be found well many good reasons in the years to come and rightly so. It's been a long time coming and the public has the right to know that we are a free, honest and independent press.

Yours truly,
Beacon Hills

Newstech #12

6 June 1990

RECEIVED
JUN 14 1990
1263
REGIONAL RESOURCE
DEVELOPMENT BRANCH

Major Project Review Process
Regional Planning and Infrastructure Branch
Ministry of Regional and Economic Development
4th Floor
712 Yates Street
Victoria, B.C.
V8W 1X5

Attention: Mr. Derek Griffin, Coordinator:

I sincerely hope that the Major Project Review Process holds public hearings into the potential environmental impacts of the proposed Newstech newspaper recycling plant, before rezoning approval is given.

The potential toxicity and environmental impacts of the sludge and waste water effluent are not adequately known. I am an environmental writer and I'm currently researching a major article on Fraser River pollution. It would be nice to cite this project as a model for proper environmental planning and safeguards. Again, I urge you to hold full public hearings before the building of this plant is approved.

Sincerely,

Craig Orr

Craig D. Orr, Ph.D.
1037 Madore Avenue
Coquitlam, B.C.
V3K 3B7

Member, Social Development Council of District 43, Environment Committee

A Director, Steelhead Society of British Columbia

Member, Forest Land Use Liaison Committee of British Columbia

Member, Trout Unlimited Canada

APPENDIX 3

Government Agency Comments

Province of British Columbia

Ministry of Regional and Economic Development

MEMORANDUM

To: Derek Griffin
MPRP Coordinator
Ministry of Regional and
Economic Development

June 13, 1990

Re: Newstech's Proposed Newsprint De-inking Plant

The Ministry of Regional and Economic Development supports the establishment of a newsprint de-inking plant in British Columbia, such as the one proposed by Newstech.

A newsprint de-inking facility will be of significant benefit to British Columbia's newsprint manufacturers because of new requirements for recycled fibre content in the industry's traditional markets. California, the largest market for B.C. newsprint producers, has recently enacted legislation requiring newspaper publishers to have 25% of their newsprint contain 40% recycled fibre by 1991 (effectively 10% recycled fibre) rising to 50% of their newsprint containing 40% recycled fibre by 2000 (effectively 20% recycled fibre). Other states have also enacted legislation, or are considering legislation, to force newspaper companies to use a certain percentage (which varies from state to state) of recycled newsprint in their newspapers.

Even where legislation is not being enacted, publishers are shifting to increased use of recycled newsprint. The President of the Seattle Times, Mr. Mason Sizemore, is reported to have told a business outlook conference hosted by the Conference Board in Calgary that his newspaper would be moving from 2% recycled newsprint in 1990 to 35 % by 1991 and 75% by 1995.

In order to maintain our market share, British Columbia's newsprint mills will soon have to use (some) recycled newsprint furnish in their production of newsprint. The Newstech newsprint de-inking plant would provide a local source of recycled fibre for the B.C. newsprint industry.

Specific comments related to Newstech's project are as follows:

1. **Financial Viability.** MRED is satisfied that Newstech's proposed mill is feasible, provided that sales contracts with Fletcher Challenge and MacMillan Bloedel materialize, and that adequate supplies of old newsprint (ONP) and magazines are available at reasonable prices.

.../2

However, it should be understood that, in the absence of legislation forcing newspaper publishers to use recycled fibre, this project would not have been brought forward. Recycled fibre may well represent higher cost fibre for newsprint mills, particularly if capital costs for new facilities must be fully recovered by the de-inking facility on top of raw material and other operating costs.

Financial assistance from the government has been requested by the proponent to ensure project viability through the critical startup period. A decision on provincial funding will not be made until after the project has received approval-in-principle from the MPRP.

2. **Economic and Employment Benefits.** If this project proceeds, it will directly contribute $85 million in new capital investment in the GVRD area, and provide employment for 68 persons on an ongoing basis. It will diversify the regional and provincial economy, and contribute to greater vertical integration in the newsprint industry. Indirectly, it will provide increased security for the province's newsprint industry by producing a local source of recycled newsprint furnish.

3. **Proven Technology.** Newstech plans to use proven technology and equipment for its de-inking process. MRED is not aware of any serious problems associated with other de-inking plants using similar technology and equipment.

4. **Availability of ONP Supply.** Availability of ONP supply at reasonable cost is a key issue. The limited supply of locally available ONP means that this mill will have to source most of its supply from outside the Lower Mainland area, possibly from as far away as Saskatchewan and Manitoba. Newstech's assumptions on ONP and magazine availability for British Columbia and Alberta appear somewhat optimistic, and if unrealized, and will likely require Newstech to import from the United States. Development of additional newsprint de-inking facilities near large urban centres in the Pacific Northwest may well make this costly.

.../3

At this time, the status of supplies available through the GVRD is still uncertain. Although Newstech is the only proponent expected to meet the domestic remanufacturing criterion of the GVRD tender for ONP from its member municipalities, this cannot be confirmed until the June 14, 1990 deadline.

5. **Site and Infrastructure Development.** MRED believes that the Fraser Mills industrial area of Coquitlam is a very suitable site for this project, particularly since dock facilities are already present at the site. This project does not require any infrastructure support from the Ministry of Regional and Economic Development.

CONCLUSION

The proposed Newstech project is important to the viability of B.C.'s newsprint industry. MRED's main economic concern relates to the's project sourcing of ONP at a satisfactory price. To the extent that some ONP must be brought in from other jurisdictions, it will, after de-inking, represent an imported contribution to B.C.'s solid waste.

Generally, however, the ONP supply problem relates to project financial viability and will be carefully considered if and when the government provides financial assistance. It is not an issue that should prevent giving immediate approval-in-principle at the Prospectus stage, subject only to satisfactory arrangements on waste disposal.

W. E. Freeman
Director
Industrial Development and
Policy Branch

MINISTRY OF ENVIRONMENT

Policy and Planning Branch

Province of
British Columbia

Parliament Buildings
Victoria, B.C.
V8V 1X5

Mr. D. Dryden and F. Blasetti
Co Chairmen, Major Project Review Process
Ministry of Environment and Ministry of
Regional and Economic Development.
777 Broughton, Victoria, B.C.
V8V 1X5

File 65.422

June 13,1990

Dear Sirs;

The Ministry of Environment is pleased to submit comments and recommendations on the Prospectus of Newstech Recycling Inc. for their proposed newspaper de-inking project in Coquitlam British Columbia. During this review, Ministry of Environment staff visited a comparable newspaper and magazine recycling plant in Portland.

The Oregon plant discharges liquid effluent directly to the Willamette River following treatment by clarifier and an aeration lagoon. Solid waste from the flotation process is disposed of as a 2-inch top dressing to agricultural land on a once only basis. Monitoring by the Oregon Department of Environmental Quality has indicated that there are no outstanding environmental concerns related to dioxins or heavy metals in either the liquid effluent or the solid waste.

The Ministry welcomes the opportunity for the recycling of old newspapers and magazines in the province. In addition to the plans presented in the Prospectus, however, several other conditions must be met. The Ministry requires written commitments from Newstech with respect to the following four items:

1. To provide an Emergency Response Plan for potential spills of hazardous chemicals and for safeguards and procedures to be used during plant startup or upset conditions. The plan must provide adequate containment of spills to prevent discharge to the GVRD system or to the Fraser River.

2. To undertake testing and monitoring of the effluent and sludge to ensure that heavy metals or toxic substances are not entering the process. The toxicity of the effluent or sludge, or the ease of plant management, may be influenced by the composition of the feedstock. Plans for pre-processing or quality control of inputs to the plant should be outlined.

3. To undertake pilot studies for the disposal of sludge through composting or land topdressing, and report results to a review committee.

4. To notify the GVRD and the Regional Waste Manager, Ministry of Environment, if any alternate chemical is to be tested or used in the flotation process.

Upon receipt by the Major Project Steering Committee of acceptable written commitments by Newstech to these four conditions, the Ministry recommends that the project be approved in principle. The company is then urged to contact the GVRD and the Regional Manager for Waste Management in the Surrey office of the Ministry of Environment to complete the necessary regulatory permits and licenses.

Yours truly,

David Parsons

for: R. Langford, PhD.,
Environmental Assessment Branch.

cc J. McCracken, Regional Director, MOE, Surrey
MOE participants, MPRP

REVIEW COMMENTS

MPRP PROSPECTUS

NEWSTECH RECYCLING INC.

The Ministry of Environment has carried out a review of the Prospectus from Newstech Recycling Inc which outlines the environmental protection measures to be undertaken in its proposed newspaper de-inking project.

It is estimated in the Prospectus, that in 1988, about 120,000 tonnes of newsprint and magazines were consumed in B.C., and of this amount about 84,000 metric tonnes of old newspapers and magazines were going to landfill. When the Newstech plant is operational, it is estimated that about 66,000 metric tonnes will be recycled.

As proposed, the project will have an annual production of 122,500 air dried metric tonnes of 50 percent BD wet lap pulp bales of de-inked newsprint which is suitable for blending with virgin fibre. The process will require an input of 140,000 metric tonnes of old newspapers and magazines from recycling in a ratio of approximately 80% newspaper and 20% magazines. The process involves chemi-mechanical flotation of ink particles, and washing of ink from a diluted pulp suspension. The removal of ink by flotation is selective for ink particles, fibres and fillers which are removed from the surface and processed into a solid waste. Washing is a mechanical process of rinsing ink, ash and dirt particles from pulp, with ink particles then being separated from the wash water by flotation in a separate clarifier.

The physical and chemical processes used for de-inking result in solid and liquid waste products which will require proper and safe disposal such that no environmental damage occurs as a result of the operation. The de-inking of wastepaper is a relatively clean industry and the processes chosen by Newstech are among the most advanced in the industry.

Environmental protection measures which must be built into the project are for control of water quality, air quality, solid waste disposal and for storage and handling of chemicals and raw materials. The measures proposed in the prospectus have been examined and reviewed by Ministry of Environment staff.

WATER QUALITY

Discussion

The effluent from the de-inking process is to undergo primary treatment in a dissolved air flotation clarifier. Suspended solids and sticky contaminants are removed in this process. Water is then treated in a 24 hour aerated stabilization tank for reduction of BOD_5 prior to release into the Greater Vancouver Regional District (GVRD) sewer treatment system. It is anticipated that there will be no detectable dioxins in the effluent. The small amounts of these contaminants which may be present in old newspaper, will tend to remain associated with the pulp fibre. No new dioxins will be generated in the recycling process. The treated effluent will be tested for toxicity and will be required to demonstrate 100% survival in standard toxicity tests. Chlorine will not be used in the de-inking process, therefore formation of organo-chlorine compounds will not take place.

The principal chemicals used in the process consist of:

-sodium hydroxide
-sulphuric acid
-hydrogen peroxide
-sodium silicate
-magnesium sulphate
-calcium borate
-Borol
-DTPA (versenex)
-polymers
-surfactants

Of these chemicals, sodium hydroxide, sulphuric acid, and hydrogen peroxide are regulated under Transportation of Dangerous Goods Regulation. Both caustic and sulphuric acid solutions are regulated as corrosive and environmentally hazardous substances (class 8 and 9.2), while peroxide is an oxidizer (class 5.1). The pH of the waste stream, 8-8.5 in Clarifier #1 and 7.0 in Clarifier #2, indicates that if these substances are still present in the waste stream, they are so diluted that they no longer meet the criteria for the primary classification 8, 9.2 (less than 100 ppm) or 5.1. Thus, the effluent would not be considered special waste.

DTPA or diethylenetriamine pentaacetic acid is not specifically regulated under TDG. However, review of the material safety data sheet indicated this substance could possibly be regulated as a corrosive. If present in the effluent, it would not be of concern, however, due to adequate dilution.

Based on the anticipated characteristics of the waste stream, as shown in the GVRD sewer discharge application, the effluent would

not qualify as a leachable waste with respect to metals and other substances listed in the Special Waste Regulation leachate quality criteria.

Recycling of process water will be enhanced following plant startup, with reductions of flows to the GVRD interceptor from 4200m³ per day down to 2,800 m³ per day.

Surface water control will be implemented through containment curbs for runoff water and through spill control walls to contain 125% of potentially spilled material. Clean runoff from roofs and non-containment areas will be segregated and discharged directly to the Fraser River.

No groundwater is to be used.

Restrictive covenant No. AC159905 has been accepted for registration by the New Westminster Land Title Office on June 29, 1989 against the title of this property (proposed Lot 1 of a subdivision of lands undertaken by Crown Forest Industries Ltd. and Crown Forest Properties ltd.). The restrictive covenant outlines this Ministry's floodproofing requirements.

Findings and Recommendations

1. The discussions of waste water management in the prospectus are adequate. .Treatment of plant effluent will be the responsibility of the GVRD. As such, the discharge from the Newstech plant must meet the standards established for industrial sewer hookup. No significant issues are evident that cannot be resolved in the permitting process.

2. Significant quantities of hazardous chemicals will be transported and stored on site. The prospectus outlines safeguards for the storage and containment of the chemicals, however a spill response plan will be required which outlines emergency response procedures for process startup, upset conditions, spills, and seismic or flooding events. Adequate containment of spills to prevent discharge to the GVRD system or to the Fraser River must be provided. The company is requested to prepare an Emergency Response Plan at Stage III, prior to plant startup. A commitment to prepare such a plan is a necessary condition of the Ministry's approval at this point.

3. Effluent testing should be carried out as required by the GVRD.

4. Changes to the chemical makeup of the flotation process may result in the addition of toxic or nutrient rich chemicals. No changes to the specified chemicals can be made without prior approval of the permitting agency.

5. If any changes, or work in and about Nelson Creek, Schoolhouse Creek or any watercourse is proposed, an Approval under Section 7 of the Water Act will be required.

AIR QUALITY

Discussion

Emissions from the plant will be restricted to the natural gas fired power boiler flue. Water vapour will be emitted from the process stream. Boiler blowdown will be disposed of to the pulping process and is not of concern.

Findings and Recommendations

1. A potential exists for odours to be generated from the pilot composting trials if anoxic conditions arise. With adequate aeration of the compost, anoxic, odour forming conditions will not be a problem.

2. The prospectus states that the solid waste generated from flotation and washing will not be burned in the boiler, thus eliminating any concern for emission of dioxins or metals.

SOLID WASTES

Discussion

Solid wastes are generated from two sources, the first being the rejects from recycled paper, the second being the waste material from flotation. Rejects contain staples, paper clips, glass, and plastics. Flotation waste contains ash, carbon black, wood fibre, plastics and adhesives. The waste residue requiring disposal or further recycling will amount to 15,400 air dried metric tonnes per annum, 2,400 tonnes of which is non-burnable rejects. It is proposed by Newstech that rejects be landfilled and that the balance of the solid waste ultimately be recycled through a composting program. However, until the composting program has been tested, and found acceptable,on a pilot scale with full monitoring for dioxins and metals, all solid wastes will be landfilled. Information from other pilot scale composting facilities will be used as the basis for design and testing of the composting trials at Newstech.

Findings and Recommendations

1. Four options exist for the disposal or recycling of the organic solid wastes which result from the flotation and washing processes. The waste could be burned in a boiler to generate steam for the process, it could be disposed of in landfill, it could be transported to suitable silty farmland and spread as a soil ameliorant, or it could be composted and sold to the public.

Of these four options, the last two have the greatest merit. Organic material is of value as a soil conditioner and as source of nutrients. It is therefore recommended that pilot studies be initiated to dispose of the organic waste through composting or through addition to silty soils.

For either disposal method, the solid waste will need to be evaluated for content of metals, and dioxins prior to disposal. Both options should be the subject of investigation and study. Testing and monitoring will be necessary before either product could be sold. In the interim the material will need to go to an acceptable landfill site.

The Ministry supports the company's proposal to participate in a joint committee to investigate the feasibility of these options. The Ministry suggests that this committee be organized and chaired by the GVRD. Progress made by this committee should be reported to the Major Project Steering Committee at regular intervals.

2. Prior to interim disposal to landfill, the nonburnable solid waste and the residual organic waste should be subjected to the leachate extraction procedure in order to confirm that they do not classify as special waste and therefore are acceptable for disposal in a permitted landfill subject to authorization by the landfill operator.

3. The Ministry of Environment requires better definition of Newstechs' intentions with regard to sourcing and processing of newspaper and magazines. This Ministry encourages newspaper and magazine pickup through the Blue Box program. Sorting and processing of the old newspapers and magazines prior to processing is recommended in order to reduce the entry of contaminants into the de-inking process. A statement of the company's intentions with respect to quality control of inputs to the plant is required prior to project approval.

SUMMARY AND CONCLUSION

The Newstech newsprint recycling proposal as presented in their Prospectus meets all requirements of this phase of the Major Project Review Process. No outstanding environmental or technical

issues are noted that cannot be resolved in the permitting process. However, the following commitments are required from Newstech before Approval in Principle can be recommended:

1. Preparation and submission of an Emergency Response Plan for spills of hazardous chemicals and for safeguards and procedures for use during plant startup or upset conditions.

2. A commitment to undertake testing and monitoring of sludge to ensure that sources of heavy metals or toxic substances do not enter the de-inking process. Plans for the sorting or pre-processing of inputs to the plant should be outlined.

3. A commitment to undertake pilot studies for composting or land topdressing of sludge, and report results to a review committee.

4. A commitment to notify the GVRD and the Regional Waste Manager, Ministry of Environment, if any alternate chemicals are to be tested or used in the flotation process.

Upon receipt of these commitments, it is the recommendation of the Ministry of Environment that the project receive Approval In Principle and proceed to Stage III for permitting by the responsible agencies.

Province of British Columbia
Ministry of Forests and Lands

MEMORANDUM

To: Mr. Derek Griffin
MPRP Coordinator
Ministry of Regional and Economic Development
712 Yates St.
Victoria, B.C. V7V 1X5

RECEIVED
1262
JUN 14 1990
REGIONAL & RESOURCE DEVELOPMENT BRANCH

From: Industry Development Branch

Date: June 11, 1990

Our File: 232-20-030

Your File:

RE: Newstech Recycling Proposal

We have examined the prospectus and do not have any major concerns with this project. Because of the impending legislation in the U.S. in the use of recycled fibre in paper products, particularly newspaper, it is essential that a viable recycling plant be established in B.C.

There are two major problems with Newstech which will have to be overcome. These are:

1. Toxic ink in the solid waste.
   Before Newstech can establish a composting operation, it will have to show that the product does not contain any toxic materials.

2. Volume of solid waste.
   Because Newstech will have to import a large portion of its ONP and other paper, there may not be a significant reduction in the net volume of waste in the Lower Mainland. Unless Newstech can dispose of its waste through composting, it may be faced with a costly disposal problem. Burning and/or landfilling will not be acceptable in the Lower Mainland area.

Veggo Holm

V.A. Holm, P.Eng.
Industry Development Specialist
Industry Development Branch

Province of
British Columbia

Ministry of
Municipal Affairs,
Recreation and Culture

Parliament Buildings
Victoria
British Columbia
V8V 1X4

File 610.4

May 29, 1990

Mr. Derek Griffin
MPRP Coordinator
Regional Planning and Infrastructure Branch
Ministry of Regional and Economic Development
4th Floor, 712 Yates Street
Victoria, B C.
V8V 1X5

Dear Mr. Griffin:

Re: Newstech Recycling Inc.
Recycled Newsprint Plant Prospectus

Further to the April 27, 1990 request from Frank Blasetti, we have completed our review of this Prospectus and offer the following comments for consideration.

ARCHAEOLOGY

Although information is presented on page 3-17 regarding the extensive industrial use of the Fraser Mills site, the claim that "... the site is considered to have a very low potential for recovery of intact archaeological deposits" requires verification in order to ensure that archaeological resources protected under the Heritage Conservation Act are not inadvertently disturbed. In this regard, the bore holes drilled for the environmental audit present an excellent opportunity for a qualified archaeologist (list attached) to interpret site stratigraphy and the potential impact of development activities on buried archaeological deposits. In addition, the company should be advised that if archaeological remains are unearthed during construction (e.g. human burials), they should stop work and contact the Archaeology and Outdoor Recreation Branch (AORB). Both these concerns can be adequately addressed as conditions of Stage III permitting, and the AORB is consequently not opposed to granting approval-in-principle at the end of the Prospectus review.

....2

OUTDOOR RECREATION

The AORB has not identified any potential impacts from development activities on outdoor recreation resources.

Should you have any questions concerning these comments, please call me at 356-1438.

Sincerely,

R. A. Kenny
Senior Coordinator
Archaeology and Outdoor
Recreation Branch

RAK/ds

pc: S. Acheson

Province of British Columbia

Ministry of Energy, Mines and Petroleum Resources

MEMORANDUM

Mr. D. Griffin
MPRP Coordinator
Regional Planning and
Infrastructure Branch
Ministry of Regional and
Economic Development

June 13, 1990

52120-50/2

NEWSTECH RECYCLING PROSPECTUS REVIEW

The Ministry of Energy, Mines and Petroleum Resources has reviewed the above from the perspective of our mandate and responsibilities and has no comments at this time. Attached are B.C. Hydro's comments on the Newstech Prospectus for your information. Please contact Niall Mc Millan at 356-2169 if you have any questions about these comments.

Peter Ostergaard

Peter Ostergaard
Director
Energy Project Analysis
Branch

Attachment

Originator:

Niall Mc Millan
Project Analyst
Energy Project Analysis
Branch

Recycled Paper

BC hydro

proud of our Service

J.C. Edwards
Manager, External Relations
(604) 663-3795
FAX (604)663-3323

12 June 1990

Mr. P. Ostergaard
Senior Coordinator, Projects Section
Ministry of Energy, Mines
and Petroleum Resources
Fourth Floor
617 Government St.
Victoria, B.C., V8V 1X4

Attention: Mr. N. McMillan

Dear Peter,

Re: Major Project Review Process - Newstech

I am writing in regard to the review of the Newstech Recycling Prospectus in the context of the Major Project Review Process. The prospectus and the covering material were received in this office on 24 May 1990.

The Newstech Prospectus has been reviewed by the Transmission Customer Services department of B.C. Hydro.

We concur that B.C. Hydro has offered to supply Newstech 8MVA (approximately 100 GWhr) for a 350 ADMTPD newsprint recycling plant in Coquitlam, plus an additional 8MVA (100 GWhr) for future doubling of capacity. Supply for this plant would be at 69kV from circuit 6L17. Newstech would be responsible for design and construction of a short (approximately 250 meters) extension to reach its 69kV receiving station.

We note that the Prospectus does not include detailed information with regard to energy efficient measures being designed into the plant. In our letter to Newstech's consultant, Hipp Engineering, on 2 March 1990, B.C. Hydro had requested this information and had provided our brochure on Electrical Energy Efficiency for Industry, which outlines opportunities in this field.

We appreciate this opportunity to participate in the Major Project Review Process. I trust that our comments will be useful.

Yours truly,

J. C. Edwards

c. R. Steele

Province of British Columbia

Ministry of Municipal Affairs, Recreation and Culture

MEMORANDUM

MPRP Coordinator
Regional Planning and
Infrastructure Branch
Ministry of Regional and
Economic Development
4th Floor, 712 Yates Street
Victoria, British Columbia
V8V 1X5

BY FAX

May 9, 1990
DSB File: 705.3

Re: Newstech Recycling Prospectus Review

We have reviewed the prospectus and at this time we have no objection to recommending approval of the project.

Ray Ghosh
Senior Planner
Programs Section

RG:jg
0069

MAY 09 '90 08:02

Province of British Columbia

Ministry of Health

MEMORANDUM

June 13, 1990

MPRP Coordinator
Regional Planning and
Infrastructure Branch
Ministry of Regional and
Economic Development
4 - 712 Yates Street
Victoria, B.C.
V8V 1X5

Re: Newstech Recycling Prospectus Review

The Prospectus has been reviewed by the Ministry of Health Coquitlam office.

The primary public health implication of this proposed de-inking plant is the quantity of particulates which would be discharged from the roof exhausts. Over two tons of particulates discharged per day at the proposed site may become an important health hazard to residents of the affected area.

Apart from the other emissions, which appear acceptable, the particulates are excessive and the company should address this problem.

John J. Philion
Research Officer
Research and Evaluation
Policy, Planning and Legislation

JJP/tls

cc: N. Arnott, Medical Health Officer
J.H. Smith, Consultant, Environmental Health
T. Moore, Chief Environmental Health Officer
L. Copeland, Manager, Environmental Health Protection
B. de Faye, Director of Policy
G. Curtis, Executive Director, Policy, Planning & Legislation

Province of British Columbia

Ministry of Native Affairs

MEMORANDUM

To: MPRP Coordinator
Regional Planning and
Infrastructure Branch
Ministry of Regional
and Economic Development

May 30, 1990

RECEIVED
1990
1164
BR

Re: Newstech Recycling Prospectus - April 1990

Thank you for your memorandum of April 27, 1990, requesting comments from the Ministry of Native Affairs with respect to the above-captioned prospectus. I have now reviewed the prospectus and offer the following comments for your consideration.

From the information provided, it appears that the proposed paper recycling plant is located within the comprehensive land claim of the Musqueam Indian Band. This claim is presently under review by the Federal Government, to ascertain if it meets the guidelines of the Federal Comprehensive Claims Policy. In addition, the Katzie and Coquitlam Bands have reserve lands in the vicinity of the proposed project.

The Katzie and Musqueam Bands are members of the Alliance Tribal Council, while the Coquitlam Band is an independent Band, unaffiliated with any Tribal Council. A list of addresses and contacts for these organizations is enclosed for your convenience.

Given the Native interests in the area, I suggest that Newstech provide the above Bands and Tribal Council with an opportunity to outline any concerns thay may have regarding potential economic, environmental, cultural and social impacts arising from the proposed recycling project. For your convenience, an appendix outlining some possible issues of concern to Native people in the area is attached.

.../2

Thank you for providing the Ministry of Native Affairs with an opportunity to comment on the proposed Newstech Recycling Project. If you have any questions regarding these comments, please do not hesitate to contact me at 356-8282.

Carol D.M. McNichol
Manager
Natural Resource Management

Enclosures

LDB:cw

TRIBAL COUNCILS AND BANDS IN THE VICINITY OF THE PROPOSED NEWSTECH RECYCLING PLANT

Alliance Tribal Council
Coordinator: Andrew Charles
6615 Salish Drive
Vancouver, B.C.
V6N 4C4
Telephone: 263-1975
Fax: 263-4201

Coquitlam Indian Band
Chief Georgina Williams
Colony Farm Rd. - 65
Port Coquitlam, B.C.
V3C 3V4
Telephone: 941-4995

Katzie Indian Band
Chief Diane Bailey
10946 Katzie Road
Pitt Meadows, B.C.
V0M 1P0
Telephone: 465-8961

Musqueam Indian Band
Chief Ernest Campbell
6370 Salish Drive
Vancouver, B.C.
V6N 2C6
Telephone: 263-3261

POSSIBLE ISSUES OF CONCERN TO NATIVE PEOPLE -- NEWSTECH RECYCLING

Aboriginal Fishing:

Bands in the area are likely to be concerned about potential impact on the fishery resource.

Native people in the lower mainland area traditionally rely on fishing for their food supply, and special food fishing permits have been granted to them under the Federal Fisheries Act. Regulation of fishing has been challenged in the courts, on the basis of aboriginal rights and the Indian Act.

Environmental Protection:

Native people are concerned about potential negative impacts on the environment and are beginning to take stronger steps to prevent such impacts and to have their concerns addressed. For example, on February 1, 1990, the Fort George Band commenced legal action against pulp mills in the Prince George area for "polluting and poisoning" the Fraser River. Other Native groups, including the Alliance Tribal Council, have voiced similar concern about impacts on the environment arising from chemical spills and introduction of other pollutants into the lower Fraser River.

Comprehensive Land Claims:

The Federal Government considers applications by Native groups for claims to large areas of land based on the concept of "Aboriginal Title". As mentioned, the Musqueam Band has filed a comprehensive land claim with the Federal Government.

In general, the Band has been opposed to third party interests which might affect their land claim. For example, in Musqueam Band v. The Queen in Right of B.C. et al (British Columbia Court of Appeal, 1989), the Musqueam Band sought a declaration of aboriginal right to the Crown lands comprising the University Endowment lands and an injunction preventing transfer of the land. The injunction was granted by the B.C. Supreme Court, but later overturned by the B.C. Court of Appeal on the condition that transfer from the Province to the Regional District would not prejudice the claim of aboriginal rights.

Heritage Resource Protection:

Native people are becoming increasingly concerned about the destruction of heritage resources. Thus I was pleased to note from section 3.2.11 of the prospectus that the proponent is aware of the possible presence of Native archaeological and heritage resources, and will initiate detailed archaeological investigations if any such resources are discovered.

Employment:

As you are probably aware, Native people are under-represented in the workforce. The Bands and Tribal Council located in the vicinity of the proposed project are likely to be interested in any employment opportunities for their members.

Province of British Columbia

Ministry of Crown Lands

MEMORANDUM

To: MPRP Coordinator
Regional Planning and
Infrastructure Branch
Ministry of Regional and
Economic Development
4th Floor, 712 Yates Street
Victoria, B.C.
V8V 1X5

Date: 90-06-04

File: 11-4-30

1237

BP

Re: Newstech Recycling Prospectus Review

Ministry staff from the Lower Mainland Region have reviewed the Newstech Recycling proposal and advise that there are no Land Act tenuring implications associated with this project.

Thank you for providing us with an opportunity to comment.

Lynn Kennedy
Manager
Policy and Documentation
Land Policy Branch

Recycled Paper

Province of British Columbia

Purchasing Commission

MEMORANDUM

To: Frank Blasetti
Director
Regional Planning and
Infrastructure Branch

Date: May 29, 1990

Re: Newstech De-inking Facility Proposal

The Purchasing Commission has no objections to Newstech's proposed procurement methods for the planned de-inking facility.

Procurement guidelines for major projects in the province encourage developers to support B.C. and Canadian industry by 1) providing relevant information to the supplier community, and 2) considering potential suppliers to the project on the basis of competitiveness and best overall value to B.C. and Canada.

Regardless of the degree of provincial funding in major projects, the approach of the Purchasing Commission is to work closely with developers to encourage them to give maximum consideration to B.C. and Canadian firms in their procurement decisions. We also assist where possible in facilitating the exchange of information between the developer and suppliers regarding project requirements and supplier capabilities.

Anton Kuipers, our Supplier Development Officer in Vancouver, met earlier this month with Mr. Stuart Belkin, President of Newstech Recycling Inc. Mr. Belkin is keen to cooperate with the Purchasing Commission and has indicated that the procurement process for the de-inking facility aims to maximize opportunities for B.C. suppliers.

Further to this, Newstech has suggested that a representative from the Purchasing Commission meet in early June with HIPP Engineering, the company responsible for overseeing procurement and construction of the Newstech plant, to discuss our supplier development initiatives.

If you require further information please feel free to call me at 389-3364.

Leslie Anderson

Leslie Anderson
Policy/Program Development
Officer

pc: Anton Kuipers

Province of British Columbia
OFFICE OF THE DEPUTY MINISTER

Ministry of Advanced Education, Training and Technology

MEMORANDUM

To: Derek Griffin
MPRP Coordinator

Date: 11 June, 1990

Re: Newstech Recycling Prospectus Review

An economically viable and environmentally sound newspaper recycling plant in British Columbia will be welcomed by the Ministry. However, a number of questions remain with regard to the prospectus.

1. Is the technology to be used by Newstech a proven technology utilizing the latest advances in the field? If not, Newstech may be encouraged to use leading edge technology if appropriate.

2. To what degree is there interaction between Newstech and university researchers? What is the nature of the interaction and is there any government funding attached?

3. There is some concern as to the availability of newsprint supply. The plant is expected to operate on a scale larger than can be supplied by the province, even if all collected newsprint were to be supplied to the plant. It is understood that given present newspaper supply/demand conditions Newstech will have to ensure supply from out of province. What is the impact on the firm of not securing sufficient newspaper supply?

4. Given that there is to be considerable provincial government financing for the project, have any steps been taken to ensure that procurement practices are beneficial to the province?

We trust that there will be opportunity to review these issues following the Stage One report. Should you have any questions or require further information please contact myself at 356-8396 or Leslie Lax at 356-7253.

Har Singh
Executive Director
Policy Planning and Program Evaluation

Province of British Columbia

Ministry of Tourism

MEMORANDUM

JG Day

TO: MPRP Coordinator
Ministry of Regional and
Economic Development

DATE: June 12, 1990

RE: Newstech Recycling Prospectus Review

Thank you for the opportunity to review this Newstech prospectus. We are encouraged by this initiative in terms of its potential to create alternate fibre supply, thereby reducing harvesting pressure on forests which serve as valuable tourism resources.

There are a few areas in the prospectus that require clarification. These include:

- What are the risks from flooding and earthquakes in terms of the toxic chemicals and wastes that will be associated with the facility? These risks should be minimized.

- Will this facility produce offensive odors similar to pulp mills? These odors would have a negative impact on tourism.

- Could the risks of pollution to the Fraser River be reduced if the facility location was changed? If so, what are the options?

- How will the solid waste be disposed of? Several methods are referred to but it is not clear which one will be used.

Clarification of these issues will assist the Ministry of Tourism in determining whether this proposal will have an adverse impact on tourism.

Stuart Gale
A/Executive Director
Policy, Planning and
Operations Division

Province of British Columbia

Ministry of Social Services and Housing
CORPORATE SERVICES DIVISION
POLICY, PLANNING AND LEGISLATION BRANCH

MEMORANDUM

To: Mr. Robert D. Steele
Secretary
Major Project Steering Committee
Ministry of Regional and Economic Development
712 Yates Street
Victoria, British Columbia
V8V 1X5

Date: June 14, 1990

Re: Newstech Recycling Prospectus Review

Further to Sharon Kennedy's conversation with Derek Griffin, MPRP Co-ordinator, the following comments are to replace our memo of May 16, 1990.

I have reviewed the Prospectus and from the standpoint of this Ministry, there is no objection to Approval in Principle to the proposal as described at the Prospectus stage. We recommend, however, that the proponent be asked to contact the Ministry's Area Manager in Coquitlam, Mr. Tom Schramm, at 464-5436 to discuss hiring procedures. We would like to ensure that Ministry clients have the opportunity to compete for available jobs.

Fern Jeffries
Director

Province of British Columbia

Ministry of Transportation and Highways

MEMORANDUM

To: Mr. Robert Steele
Research Officer
Regional Planning and Infrastructure Branch
Ministry of Regional & Economic Development

June 14, 1990
Major Projects
2A-940 Blanshard St.
Victoria, BC V8W 3E6
387-7560
Fax: 356-9512

Fax: 356-8212
original following by mail

Re: Proposed Recycled Newsprint Plant

I have reviewed the proposed development from the point of view of future ministry transport improvement strategies and found no conflict areas.

J. Gregg Singer
Project Director
Vancouver Island Highway Project

JGS/lf
Attachment

Province of British Columbia

Ministry of Parks
VICTORIA, B.C.

MEMORANDUM

To: Robert D. Steele
Secretary
Major Project Steering Committee
Ministry of Regional and Economic Development

Date: 90/06/13
File: 3-16-1-13

Re: Newstech Recycling Prospectus Review

This is to advise you that the Ministry of Parks has reviewed this prospectus and has no comments on the proposal.

Louise Goulet

L. A. Goulet, Ph.D.
Manager, System Planning and Policy

cc: G. Trachuk, Director, South Coast

LG/lw

metheus/memlet/1210.90

90/06/13

Recycled Paper

Environmental Protection
3rd Floor, Kapilano 100, Park Royal
West Vancouver, B.C. V7T 1A2

Our file: 4186-8

Mr. R.D. Steele
Secretary
Major Project Steering Committee
Ministry of Regional and Economic Development
4th Floor, 712 Yates Street
Victoria, B.C.

Dear Mr. Steele:

Re: Newstech Recycling Inc. - Newspaper Recycling Plant Prospectus

Attached, for the consideration of the Major Project Steering Committee are comments resulting from our review of the subject prospectus.

Should you have any questions regarding the comments please contact David Ellis (666-2690) or Fred Claggett (666-6262).

Yours truly,

M. Ito
Director
Pollution Abatement and Compliance Branch

cc. R. Duncan, DFO

Environmental Protection
Conservation and Protection, Environment Canada

Reviev of the Prospectus for the Proposed Recycled Newsprint Plant by Nevstech Recycling Inc.

General Overviev

Staff of Environmental Protection have revieved the various elements of the proposal, and comments are provided for consideration.

It is fortunate that the technology proposed is not nev, and that experience with other plants can be drawn on to assess the impacts. Staff have utilized contacts with the Ministry of Environment in Ontario to assess various elements of the proposal, not only to draw on the knovledge gained from the existing plant at Thorold, Ontario, but also with respect to the reviev of a proposed nev operation.

A number of issues require further examination.

Site Contamination

The site evalutation by the hydrogeological consultants, TRI, indicates that the property was previously used as a sawmill, most lately owned by Fletcher Challenge. Despite the evaluation of the consultants that there are no difficulties with the site, data provided on the water quality of surface drainage indicate levels of chlorophenates that are above the established levels for working sawmills.

This would indicate probable heavy soil contamination on site with chemicals previously used by the sawmill for wood protection.

It is recommended that the plan require the necessary remediation of the site to preclude further discharge in excess of 6 ppb. This may require Nevstech to work with Fletcher Challenge.

Effluent Discharge

Notwithstanding the proposed discharge to the GVRD sevage system, the discharge from this operation will have to comply with the Fisheries Act Pulp and Paper Regulations (including the current revisions in progress). In particular, this requires that levels of BOD, s vvuspended solids, and toxicity be met at the point of discharge to the sever. It is unlikely that the proposed 24-hour aeration can meet these requirements, especially for toxicity.

Nevstech may apply to Environment Canada to be relieved from the requirements, providing that evidence is provided to shov that equivalent offsite treatment (other than by dilution) is afforded to the discharge.

While the prospectus provides some indication of the characteristics of the effluent stream requiring treatment (GVRD Questionaire), it would be appropriate to include information on vaste streams from some of the other de-inking mills mentioned in the document. The effluent characteristics from the Nevstech plant will differ from the Thorold plant since the Nevstech plant does not have a thermo-mechanical pulp mill contributing a liquid effluent to the vaste stream.

Ontario MOE, through its MISA program has extensive data on priority pollutants contained in the discharge. Indications from the referenced document is that a good treatment system is required to ensure that all chemicals of concern are kept to a minimum in the discharge. Of particular concern is that the 24-hour aeration treatment will provide enough treatment to concentrate some of the chemicals, particularly the metals in the biological floc. In the current proposal, no provision is shown for secondary clarification. In the Appendix to the prospectus the aeration system is stated to be an aerated stabilization basin. It is expected that this will produce a biological floc which will be discharged to the sever. In the Thorold plant excess biomass is combined with the primary sludge and de-inking sludge, devatered, and removed for disposal.

It is strongly recommended that the Company provide a higher degree of treatment, and that secondary clarification be required prior to discharge to the sevage treatment plant. The value of continued discharge to the sever in this scenario should be reexamined.

Solid Wastes Handling

Paper mill sludges are specific to the mills that produce them hence need to be individually characterized. Of concern are the levels of dioxins that may be in the sludge. The prospectus does not indicate in the Solid Waste section of Chapter 3 hov this concern vill be addressed, although there is reference in the Wastevater section that there will be traces of dioxins in the incoming rav material (ONP) but it will remain in the pulp. Sufficient anlysis of the vaste sludge will be required to determine concentrations. This should be an ongoing requirement as it is expected that concentrations will change as newsprint mills upgrade their processes.

The Ontario MOE is closely examining the issue of trace amounts of dioxins in the sludge (ppt levels), vith the projection that the sludge may be used for soil amendment. Quebec and Ontario Paper in Thorold have interim permits for disposal at industrial reclamation sites and selected agricultural lands. MOE are presently developing parameters to satisfactorally assess sludges and are developing a standard for dioxin levels. There are already standards in Ontario (Provincial Interim Guidelines in BC) for heavy metals in sludges.

The prospectus contains very little information about the composition of currently-used printing inks especially in the trace amounts area which may be associated with coloured inks. Since there appears to be concern about the composition of the inks, which would be concentrated in the de-inked sludge the proponent should be required to supply the information. Because reference is made to the many mills in operation, such information should be available.

Of interest is a reference in the Prospectus on page 3-18 to the "FLEXO" ink process. Personnel at the Q & O Paper Company advised that paper printed with this process is not acceptable for their de-inking process. The ink apparently stains not coats the fibres and it is difficult if not impossible to de-ink. The proponent should be made avare of this concern as the Q & O Paper Company advised a publisher that his newspapers could not be de-inked if he changed his printing process to use a FLEXO ink system.

Other Environmental Issues

Other issues have been raised by the public in response to the Prospectus, including noise, visibility, etc. These are beyond the mandate or competence of Environment Canada.

Conclusions

The construction of a de-inking mill in the Lower Mainland of British Columbia will address a on-going solid waste management issue which, if successful, will result in the beginning of the use of recycled fibre in newsprint produced in British Columbia.

The above discussion has indicated a number of areas of concern which should be addressed, some before and some after, commencement of the project.

Provided the proponent is required to respond to these concerns either as a requirement of obtaining the appropriate permits or as a reportable conditions of a permit Environment Canada does not have any objection to the project proceeding.

June 13, 1990

Greater Vancouver Regional District
4330 Kingsway, Burnaby, British Columbia, Canada V5H 4G8
Environmental Services

Sewerage & Drainage, Solid Waste – (604) 432-6450 Fax (604) 432-6298 • Pollution Control, Quality Control – (604) 436-6700 Fax (604) 436-6707

File: PC. 17.00.00
~~PC. 548.89.33~~ ✓
SD. 95.02.7.062

June 12, 1990

PC ROUTING
File # PC
I.D. # 12402
Section Code
Action Copy
Info. Copy

Mr. Derek Griffin, MPRP Coordinator
Ministry of Regional and Economic Development
712 Yates Street
VICTORIA, B. C.
V8V 1X5

Dear Mr. Griffin:

Re: Newstech Recycling Prospectus

Thank you for giving us the opportunity to comment on the Newstech Recycling Prospectus document, as part of step one of the Major Project Review Process (MPRP). Cristina Jacob of my staff has coordinated the reviewing of the Prospectus by the various affected departments of the GVRD. Three sets of comments and recommendations are enclosed covering the areas of involvement by the District as a regulatory or service agency: sanitary sewer discharges, air emissions, and solid waste disposal.

Conditional on the proponent providing adequate response to our comments, including indication of the steps to be taken to address the issues raised in our reviewing of the Prospectus, we do not oppose giving the project approval in principle entering the permitting stage of the process. Our review indicated that there are no major issues that cannot be addressed and resolved during the period of permitting of the operation.

Yours truly,

B. F. Talbot
Chief Engineer and Manager of
Environmental Services

BFT:es
E2/157
c.c. B. E. Marr, Regional Manager, GVRD
J. B. Mills, GVRD
C. Jacob, GVRD
L. H. Hayton, GVRD
T. Allas, GVRD

Attachments

JUN 14 '90 13:32 FROM GVRD 7TH FLOOR PAGE.002

MEMORANDUM

TO: Brian Talbot

DATE: June 11, 1990

RE: NEWSTECH RECYCLING PROSPECTUS

FILE: 548.89.33/
17.00.00

As requested I have reviewed the Prospectus document and the following presents my comments with respect to the proposed discharge into the District sewer. It is my understanding that the purpose of my review is to signal any problems with the proposed project, within the area of wastewater treatment and disposal, and to request that Newstech Recycling satisfactorily addresses them. If Newstech is able to address all issues identified at this step, the MPRP Steering Committee will grant them "approval in principle" and they will (re)enter the permitting and licensing stage.

Background

District's review of the Prospectus is part of the step one of the Major Project Review Process(MPRP). This process has been initiated by the Province several months ago and, technically, Newstech Recyling should not have been subjected to it, as they were already in the permitting stage at the time the process was announced. Due to the importance of the project, Newstech Recycling have agreed to enter the MPRP, and they submitted the Prospectus to the MPRP Steering Committee late in April.

As you may be aware, Hipp Engineering, the consultant doing the engineering work for Newstech has made an application for sewer discharge on their behalf since December 1989. In January 19, 1990, we have advised them that, based on the information that they have submitted to us, it appeared that the proposed discharge is acceptable for disposal to sanitary sewer and that an order under the Waste Management Act, stipulating the terms and conditions for the discharge will be issued. They were also advised that the discharge criteria, to be specified in the order, may contain contaminant concentration limits more stringent than the draft Bylaw limits where their information shows that the reduced levels are attainable.

Prospectus review and comments

My comments on the proposed discharge by Newstech are based on the information that they are submitting in the Prospectus and on the investigations that our department have been doing since we last communicated with Newstech on the acceptance, in principle, of their discharge into sewer. I would like to point out that the exact conditions of acceptance of their effluent into sewer have never been established or communicated to them and the terms of their permit are still to be determined. From my department perspective our reviewing of the Prospectus is another step in our assessment of their application to discharge to sewer.

JUN 14 '90 13:32 FROM GARD TTH FLOOR PAGE.003

Results of our investigations

To present, we have not been able to locate a plant with similar characteristics to the proposed Newstech de-inking plant. The main reason for that is that most de-inking operations are usually combined with a thermo-mechanically pulping (TMP) operation and their final product is usually newprint paper and not recycled newsprint pulp, as is the case with Newstech. We obtained valuable information from a visit to the Smurfit plant in Oregon City, a MISA document on effluent monitoring regulation for the pulp and paper sector and an EPA document on effluent limitations, guidelines, and standards for the pulp industry.

Several issues became apparent as a result of the additional information:

- De-inking plants usually apply secondary treatment to their plant effluents. In some cases the treatment consists of primary clarification, high rate biological treatment, and secondary clarification(Quebec and Ontario Paper and Fraser Inc. plants in Thorold, Ontario), and in some cases the treatment consists of primary clarification and aeration lagoon (Smurfit plant in Oregon City, Oregon).

- Toxicity is a problem with de-inking plant effluent and it appears that is not necessary due to the ink composition but in some cases to the chemicals that are used in the de-inking process. Smurfit representatives advised that they had to compromise between the de-inking efficiency and effluent toxicity.

- There is little control by the de-inking plant of the inks that printers use in their processes. The ratio between the water-based inks and the oil-based inks is, however, of paramount importance, to the type of de-inking process that is used to efficiently remove the ink: oil-based inks are best removed by air flotation while the water-based inks are best removed by washing.

- Besides the metals which appear in the plant effluent at ppm levels and whose presence is more due to contamination of newsprint by paper clips and staples than to the inks, several other contaminants that have been determined in the effluent from de-inking plants are: butyl benzyl phthalate(3-5ppb), cyanide (220-2600 ppb), toluene (316ppb-1720ppb), phenol (164 ppb) and di-n-butyl phthalate(10-141ppb).

- Characteristics of the effluents from de-inking plant, besides toxicity, vary largely from day to day. Smurfit plant's primary clarifier effluent quality records indicate variations from a low level of 47ppm of TSS to a high level of 4,446ppm of TSS. Smurfit plant's aerated lagoon system not only reduces the levels of contaminants but also equalizes the highly variable characteristics of the primary clarifier output.

Wastewater treatment proposed by Newstech

Newstech will be producing 4,200 m3/day of wastewater in the first year of operation and 2,800 m3/day after process optimization. The wastewater is intended to be disposed to the District sewer following primary clarification and biological oxidation in an aeration tank(24 hour retention tank). The Prospectus indicates that the proposed treatment will achieve effluent contaminant levels 20% below the proposed Regional Sewer Use Bylaw limits of 600 ppm TSS and 500 ppm BOD and that toxicity of the effluent will be at or below the level in the District interceptor to which they will connect.

JUN 14 '90 13:33 FROM GVRD 7TH FLOOR PAGE.004

Comments on the proposed treatment, effluent characteristics, and other aspects of the Newstech operation that may influence the effluent characteristics.

1) I recommend that the District accept into its sewers only effluent treated by full secondary treatment, including secondary clarification. The following factors were taken into consideration when making this recommendation: industry standards; availability of technology; protection of the Fraser River of additional metal and toxic material loadings; protection of the sewage sludge from increased metal and other toxics loadings; District capability to handle extra volumes of sludge at Annacis STP.

   The dissolved air flotation(DAF) clarifiers that Newstech is proposing to use are very efficient clarifiers in removing solids from a plant such as Newstech and it is expected that very low suspended solids levels can be achieved by Newstech. Our further evaluation of the proposed biooxidation system will determine the level of BOD that the proposed system will be able to achieve.

   The full secondary treatment will achieve, besides the reduction in TSS and BOD loadings to the river, less variability of the effluent characteristics. Variations in effluent quality are expected and they are probably going to happen with a higher frequency and magnitude in the first year of operation. While the District does not want its sewer system be abused by any user to the detriment of the receiving environment, it fully recognizes the capability of its sewer system to attenuate surges of contaminants. Setting long-term standards at low levels and setting short-term standards at higher levels, to allow for system upsets and start-up inconsistencies, will be my recommended approach when discharge limits will be set for Newstech effluent. The exact limits to be met by the Newstech effluent are still to be determined by the District. Decision will be made based on levels attained by similar technology and on input from senior levels of governments.

2) I recommend that the toxicity of Newstech's effluent be monitored on a strict schedule and be part of their permit requirements. Toxicity data from other plants indicate that their effluents meet the 96hLC50 at 100 % concentration. Full secondary treatment and control of the toxicity of additives used by Newstech in the de-inking process should be able to achieve a similar low toxicity level. It must be understood that the toxicity test is a very efficient tool to ensure that toxic chemicals are kept at low levels. Given the diverse nature of raw materials and the complex formulations of additives used in the de-inking process it would be unrealistic to try to monitor for particular types of contaminants. Newstech approach to compare the regular sewage toxicity to its plant effluent toxicity is discounted by our department as the toxicity of the two are not caused by levels of the same types of contaminants. The types of contaminants that may render Newstech effluent toxic cannot be removed at the District STP and it should be removed before it leaves Newstech.

3) I recommend that the quality and composition of the newsprint and magazines that constitute Newstech's raw material be controlled to the maximum possible extent. Newstech should be able to discuss with the local printers and printers from areas that will supply the waste paper and to have full

JUN 14 '90 13:54 FROM GVRD 7TH FLOOR

understanding of the types of inks that the printing industry is using. The inks have a tremendous impact on de-inking process efficiency, on the chemicals used in de-inking and, subsequently, on the toxicity and contaminant levels in effluent and sludge produced by the process.

4) I recommend that the permit metal levels be set lower than the proposed RSUB as there is the potential for a large increase of the metal loadings at Annacis, due to the high discharge flow from Newstech. It is not expected that that will be a problem for Newstech. The full secondary treatment process should be able to produce low-metal-level efluent. Additional control can be obtained by imposing restrictions on the amount of metal containing contaminants in the waste newsprint and old magazines, or limiting the ratio of magazines to newsprint.

In closing I would like to note that the sewer use permits include very detailed and strict requirements for monitoring of the effluent quality. The exact limits for the effluent discharge from Newstech will be established based on: levels attained by similar technology; best treatment standards of the industry; and input from senior levels of governments. It is my belief that Newstech will be able to address all issues that we signaled during our review and will meet our requirements.

Yours truly,

Cristina Jacob, P.Eng.
Senior Project Engineer
Pollution Control

CJ/113

MEMORANDUM

TO: Brian Talbot

DATE: June 6, 1990

RE: Newstech Recycling Prospectus

FILE: PC 548.89.33
PC 17.00.00

As requested, Pollution Control staff have reviewed the Prospectus document with respect to the proposed air emissions and attached there is a memo from Dale Budlong listing his comments. As Dale Budlong's memo indicates, based on the information contained in the Prospectus, there are no major problems foreseen with the emissions and Newstech should be able to clarify the problem of perceived high loading of particulates from the roof exhaust and the potential for odours from the plant operation.

It should be noted that an application for an emission permit was made by HIpp Engineering(on behalf of Newstech Recycling) to the GVRD in March 1990. At the time of application it did not appear that there are any major problems with the proposed emissions. During the permitting stage, further discussions with the proponent will address the issue of technology which is capable of achieving low NOx levels.

The Pollution Control staff are aware that their reviewing of the Prospectus document is part of the first step of the Major Project Review Process(MPRP) that Newstech is being subjected to. All staff are familiar with the MPRP requirements and it is fully understood by them that, until the MPRP pertinent forums give " approval in principle" to the Newstech project, no permit will be issued.

Yours truly,

Cristina Jacob, P.Eng.
Senior Project Engineer
Pollution Control

CJ/114

enclosure(1)

JUN 14 '90 13:36 FROM GVRD 7TH FLOOR PAGE.007

MEMORANDUM

TO: Cristina Jacob

DATE: June 5, 1990

RE: Newstech Recycling Inc.

FILE: 632.2.457

As requested, I have reviewed the Newstech Recycling Inc. project document, with respect to potential air emissions, and have the following comments:

(1) Boiler (emission no. 1) - typical products of combustion of natural gas and No. 2 fuel oil. Don't forsee any problems.

(2) Storage tanks (emission no's. 2, 3, 4, 5 & 6) - stated emissions from storage tanks are very low and should pose no problems.

(3) Aeration lagoon (emission no. 7) - there may be potential for odours from the proposed aeration lagoons should anaerobic conditions occur.

(4) Building roof exhausts (emission no. 8) - the rate of discharge from the roof exhausts is large. If the particulate concentration of 120 mg/M³ occurs, then particulate loading would be 2350 Kg/day, which is clearly unacceptable. I don't think general plant ventilation would result in this emission rate. However, I have no idea what the actual loading will be. Newstech should clarify this point. Additionally, I don't know if there is potential for odour from general plant operations.

Dale R. Budlong, ASoT.
Senior Pollution Control Officer

JUN 14 '90 13:36 FROM GVRD 7TH FLOOR PAGE.008

MEMORANDUM

Greater Vancouver Regional District

TO: B. F. TALBOT

DATE: June 12, 1990

RE: Environmental Prospectus - Newstech Recycling Inc.

FILE: SD 95.02.7

This memorandum comments on the Newstech Recycling Inc. proposal as it relates to the solid waste issue. The prospectus describes the proposed de-inking facility with a capacity of 140,000 tonnes per annum (tpa) of incoming fibre (newspaper and magazine stock). The proponent hopes to obtain 30,000 to 40,000 tpa of recycled fibre locally, the rest will be imported.

The plant will produce approximately 122,500 tpa of de-inked quality papermaking fibre and the process will result in approximately 15,400 tpa of solid waste residue, on an air dry basis (that is, comparable to dry newspaper). The solid waste residue is composed of:

"non-burnable" fraction (staples, paper clips, sand, etc)	2,400 tpa
"compostable" fraction	13,000 tpa
total solid waste residue	15,400 tpa

The above quantities are all on an air dry basis. The actual weight of the "compostable" fraction of the residue will be 29,000 tpa because it has picked up moisture from being wetted during the de-inking process and thus contains about 50 percent moisture.

Potential for contamination of the solid waste residue comes from the newspaper ink and from chemicals used in the de-inking process. The prospectus states that since 1980 there has been a steady movement away from mineral oils as the ink carrier to biodegradable vegetable oils. Traditionally solid waste residue from existing de-inking facilities in North America has been disposed by either incineration or landfilling. However in recent years there has been a trend towards "composting" of the

JUN 14 '90 13:37 FROM GVRD 7TH FLOOR PAGE.009

residue. District staff have visited the de-inking facilities of the Quebec and Ontario Paper Company in Thorold, Ontario and the Smurfit Company in Portland, Oregon. In both locations the solid waste residue is sold or given to local farmers as a soil additive.

The Newstech prospectus states that a program to develop a workable composting system will be undertaken and that a consultant, WCI Engineered Waste Systems Inc. of Brampton, Ontario, has been engaged to undertake this program. The proposal asks for a three-year period to prove out the composting system and to develop markets. During this period Newstech proposes that the solid waste residue be disposed at an approved GVRD disposal facility and they will pay the prevailing regional disposal fee.

Given that the District has embarked on a comprehensive program of waste reduction and recycling with the goal of significantly reducing the quantities of solid wastes requiring disposal, the District does not wish to add to this Region's solid waste disposal burden. However composting is a preferred method for reduction and reuse of the type of solid waste residue produced by the proposed de-inking facility. In light of the above I recommend that the District provide a maximum period of three years to prove out the composting system during which time the solid waste residue from the de-inking facility can be disposed at a disposal site designated by the District at the prevailing regional disposal fee.

T. Allas.

T. Allas
Director of Recycling

TA:ll
4/344

PAGE.010 JUN 14 '90 13:57 FROM GVRD TTM FLOOR

ITEM	1
MANAGER'S REPORT NO.	40
COUNCIL MEETING	90/06/11

RE: LETTER FROM NEWSTECH RECYCLING INC. WHICH APPEARED ON THE AGENDA FOR THE MAY 14TH MEETING OF COUNCIL (ITEM 22)
RECYCLED NEWSPRINT PLANT, COQUITLAM, B.C.

MUNICIPAL MANAGER'S RECOMMENDATION:

1. THAT the recommendation of the Acting Chief Public Health Inspector be adopted.

* * * * * * * *

1990 JUNE 08

TO: MUNICIPAL MANAGER

FROM: ACTING CHIEF PUBLIC HEALTH INSPECTOR

SUBJECT: NEWSTECH RECYCLING INC. RECYCLED NEWSPRINT PLANT, COQUITLAM, B.C.

PURPOSE: TO PROVIDE COUNCIL WITH INFORMATION ON STAFF'S COMMENTS UPON REVIEWING THE PUBLIC INFORMATION DOCUMENT PROVIDED BY NEWSTECH RECYCLING INC. REGARDING THEIR PROPOSED RECYCLED NEWSPRINT PLANT IN COQUITLAM, B.C.

RECOMMENDATIONS:

1. THAT a copy of this report be forwarded to:

   a) Major Project Review Process Coordinator, Regional Planning and Infrastructure Branch, Ministry of Regional and Economic Development, 4th Floor, 712 Yates Street, Victoria, B.C., V8V 1X5.

   b) Newstech Recycling Inc., c/o Mr. Stuart Belkin, Suite 1550 - Marine Building, 355 Burrard Street, Vancouver, B.C. V6C 2G8.

REPORT

1.0 INTRODUCTION:

During the regular Council meeting held on 1990 May 14, a correspondence including a copy of Public Information Document was received from Newstech Recycling Inc. regarding their proposed recycled newsprint plant in Coquitlam, B.C.

Council upon reviewing the correspondence made a resolution that staff send a letter to the Ministry of Regional and Economic Development advising them that Council will be providing a submission regarding the proposed operation in Coquitlam. In addition, Council requested staff to prepare a report upon reviewing the Public Information Document.

Staff sent a letter to the Ministry of Regional and Economic Development requesting an extension of their existing deadline of 1990 May 28 for providing written submission on the proposed operation. The request for an extension was denied, however they stated that the deadline for Government Agencies to provide written submissions was 1990 June 13 and that the Municipality of the District of Burnaby could provide written comments up to and including the 1990 June 13 deadline. Staff from Engineering, Health and Planning Departments have reviewed the Public Information Document and have provided their comments in this report.

NEWSTECH RECYCLING INC. RECYCLED NEWSPRINT PLANT, COQUITLAM, B.C.
1990 JUNE 08

ITEM	1
MANAGER'S REPORT NO.	40
COUNCIL MEETING	90/06/11

2.0 PROPOSED RECYCLED NEWSPRINT PLANT IN COQUITLAM, B.C.:

102

Newstech Recycling Inc. is proposing to undertake the construction and operation of a recycling facility in Coquitlam, B.C. The proposed facility would process 140,000 tonnes per annum of old newspapers and magazines into 122,500 tonnes per annum of recycled fiber suitable as a replacement for virgin fiber in the manufacture of newsprint.

The project is expected to create a local market for old newspapers and magazines collected from recycling programs throughout British Columbia and Alberta and is expected to establish the use of post consumer waste paper in the manufacture of newsprint in British Columbia.

Newstech's proposed recycling plant is being reviewed under the Provincial Government's Major Project Review Process (MPRP). As a part of MPRP guidelines, Newstech has submitted a Public Information Document which provides an overview of the project and addresses the potential environmental and socioeconomic impacts of the project.

3.0 MAJOR PROJECT REVIEW PROCESS GUIDELINES

The Major Project Review Process is a non-legislated working policy supported by the Environment and Land Use Act. It is administered by the Major Project Steering Committee, and co-chaired by the Ministry of Regional and Economic Development and the Ministry of Environment.

The main objective of the MPRP is to provide a comprehensive and timely assessment of the environmental and socio-economic impacts of projects not examined under existing integrated review processes.

The MPRP is divided into four steps: Prospectus Preparation and Review; Stage I Analysis and Review, Stage II Analysis and Review; and Stage III Permitting and Licensing. For projects with no significant impact, approval in principle is usually granted at the conclusion of the Prospectus Review. Upon receiving this approval, the project by-passes Stages I and II, and enters Stage III during which the proponent deals directly with individual governmental agencies to obtain approvals, permits or licenses.

Projects with unresolved technical, social or environmental issues usually require Stage I review. It is staff's opinion that the concerns noted in this report warrant the project to at least go through the Stage I review process.

4.0 STAFF'S COMMENTS UPON REVIEWING THE PUBLIC INFORMATION DOCUMENT:

The proposal to construct and operate the recycled newsprint plant is philosophically consistent with the concept of building a strong regionally based "conserver society". The proposed newsprint recycling plant would provide the industrial infrastructure for recycling the newspaper and magazines that are presently being separated from the waste stream throughout the G.V.R.D. and handled through a variety of arrangements between municipalities and contractors.

The prospectus for the recycled newsprint plant is comprehensive. The plant design which incorporates the treatment and recycling of process water within the plant and the commitment to attempt to develop a composting process for the "burnable" portion of the solid waste stream makes the plant progressive with respect to quality and quantity of waste discharge.

NEWSTECH RECYCLING INC. RECYCLED NEWSPRINT PLANT,
COQUITLAM, B.C.
1990 JUNE 06 3

ITEM	1
MANAGER'S REPORT NO.	40
COUNCIL MEETING	90/06/11

Notwithstanding the issue of feasibility of acquiring 140,000 tonnes of old newspaper and magazines, there are concerns relating to the plant operation that need to be clarified. These are categorized to include:

Solid Waste

1. The "non-burnable" waste consisting of metal and grit are proposed to be landfilled at a permitted landfill site. However, there is no indication as to which landfill it will be taken to nor are there any assurances that the landfill will be capable of accepting the waste from the proposed plant on an ongoing basis in the future.

2. Carbon black accounts for approximately 30% of the "burnable" solid waste stream. There needs to be a clarification on whether the carbon black can be recovered for recycling in ink.

3. The specific end uses of soil ameliorant that may be produced through composting of "burnable" portion of the waste stream including the type of monitoring program needed to ensure that the soil ameliorant has acceptable levels of metals, etc. for intended end uses are not indicated in the document.

4. Alternate plans for dealing with the "burnable" solid waste in an event that the composting of such wastes is not feasible have not been indicated in the prospectus.

Liquid Waste and Water

1. Information presented in the document indicates that waste water will meet Provincial and G.V.R.D. standards for various parameters. Monitoring for some parameters has also been indicated. However, the monitoring criteria for temperature and specified metals present or possibly known to be present in the waste water has not been shown in the document.

2. The percentage of the water actually recycled including the mass balance for water and other chemicals used in the process has not been provided. This would provide a complete overview of the plant process.

Miscellaneous

1. There is a commitment indicated in the prospectus for preparation of an emergency response plan for handling of the chemicals relating to the uses in the operational process. However, there seems to be a lack of commitment for spill response measures during unloading of chemicals upon delivery by trains. This is of a significant importance due to the close proximity of the site to Nelson Creek and Fraser River.

2. Fish and Wildlife have received a rather cursory review in the prospectus. As the site is located on the Fraser River, it is difficult to believe that wildlife values in the general vicinity of the plant are as low as implied in the prospectus. However, due to a long history of industrial activity at the site selected for the plant, it is plausible that the replacement of one industrial use with another will not have any significant impact on wildlife.

3. The prospectus did not include any geotechnical information for the site. This would provide information on mitigative measures required in an event of an earthquake.

EWSTECH RECYCLING INC. RECYCLED NEWSPRINT PLANT,
COQUITLAM, B.C.
1990 JUNE 08 4

ITEM	1
MANAGER'S REPORT NO.	40
COUNCIL MEETING	90/06/11

4. The composition of standard print ink is indicated to be inert carbon black combined with a resin binder and a carrier medium which is usually mineral oil or biodegradable oil. However, the document does not identify whether there would be any concerns related to the process if mineral oil is present as a carrier in the ink, or whether the oil will subsequently be a component of soil or liquid waste requiring monitoring. 104

5.0 CONCLUSION:

The proposal to construct and operate a recycled newsprint plant in Coquitlam, B.C. to process old newspapers and magazines into recycled fiber suitable as a replacement for virgin fiber in the manufacture of newsprint is philosophically consistent with the concept of building a strong regionally based "conserver society".

The proposed plant would provide the industrial infrastructure for recycling the newspaper and magazines that are presently being separated from the waste stream throughout the G.V.R.D. and handled through a variety of arrangements between municipalities and contractors.

Notwithstanding the issue of feasibility of acquiring 140,000 tonnes of old newspapers and magazines, staff have noted concerns upon reviewing the prospects which require clarification and warrant the project to undergo WPRP Stage I process.

K.C. Johnston, C.P.H.I.(C)
ACTING CHIEF PUBLIC HEALTH INSPECTOR

KCJ/DD:ro

cc: Medical Health Officer
Director Administrative &
Community Services
Director Engineering
Director Planning & Building Inspection

MAYOR'S OFFICE
511 ROYAL AVENUE
NEW WESTMINSTER, B.C.
V3L 1H9

TELEPHONE
521-3911

BY: FAX 356-8212

June 12, 1990

Mr. Derek Griffin
MPRP Coordinator
Regional Planning & Infrastructure Branch
Ministry of Regional and Economic Development
4th Floor, 712 Yates Street
Victoria, B.C.
V8V 1X5

Dear Mr. Griffin:

The City Council of New Westminster, at the regular Council meeting of June 11, 1990 instructed me to relate our concerns regarding the Newstech proposal to create a de-inking facility in Coquitlam.

As a member of the Greater Vancouver Regional District, New Westminster has participated in the solid waste discussions. The City has previously expressed to the Regional Board that any de-inking project at this time would be premature. One of our concerns is that although the region will supply approximately 30,000 tonnes of newspaper Newstech would import 110,000 tonnes per year to make up their required 140,000 tonnes. The City of New Westminster objects to importing waste to be processed particularly as 30,000 tonnes of sludge will result from every 140,000 tonnes processed and the sludge must be landfilled. We are also concerned that MacMillan Bloedel is still pursuing other options for a supply of recycled material such as mini de-inking facilities at B.C. pulp mills or a de-inking plant in California. New Westminster supports enhancing the employment base which exists in the forest industry but realizes Newstech's plant may not have any direct connection with that objective.

For the above noted reasons the City of New Westminster does not support the Newstech proposal.

Sincerely,

Betty Toporowski

Betty Toporowski
MAYOR

City Engineering Department City Hall 453 West 12th Avenue Vancouver British Columbia Canada V5Y 1V4 (604) 873-7211 Fax (604) 873-7200

City of Vancouver

City Engineer
W.H. Curtis P.Eng

Deputy City Engineer
D.H. Rudberg P.Eng

Assistant City Engineers
Water, Sanitation & Materials
B. Jones P.Eng
Departmental Services & Sewers
D.N. Stacey P.Eng

Streets: P.B. Thom P.Eng
Projects: B.D. MacGregor P.Eng
Transportation: W.P. Brown P.Eng
Electrical & Traffic Comm.
T.E. Waider P.Eng

June 13, 1990

Mr. Derek Griffin
MPRP Coordinator
Regional Planning and Infrastructure Branch
Ministry of Regional and Economic Development
4th Floor, 712 Yates Street
Victoria, B.C.
V8V 1X5

Dear Mr. Griffin:

NEWSTECH RECYCLING PROPOSAL, COQUITLAM, B.C.

I am acknowledging receipt of your letter of June 8, 1990 concerning the Provincial Government's major project review process (MPRP) for the proposed Newstech de-inking facility in Coquitlam, B.C.. The City of Vancouver's interest in this facility is limited to the arrangements whereby our newspaper is directed to the proposed facility. This matter has been reviewed by Council and approval has been given to the Greater Vancouver Regional District's tender call for a regional newspaper processing facility.

As a result, we would look towards the Regional District to fully investigate all aspects of the de-inking facility's operation as a part of their tendering process. Any concerns or issues identified by the Regional District's staff would be made available to the member municipalities.

Thank you again for the opportunity to comment.

Yours truly,

D.H. Rudberg, P.Eng.
Deputy City Engineer

DHR/wh
ed1116
cc: City Clerk
Len Hayton, G.V.R.D.

THE CORPORATION OF THE DISTRICT OF
BURNABY
4949 Canada Way, Burnaby, B.C. V5G 1M2
Department of the Municipal Clerk
Telephone (604) 294-7290

1990 June 12

Mr. Derek Griffin, MPRP Coordinator
Regional Planning and Infrastructure Branch
Ministry of Regional and Economic Development
4th Floor - 712 Yates Street
Victoria, B. C., V8V 1X5

Dear Mr. Griffin:

The Council of The Corporation of the District of Burnaby, at the regular Council Meeting held on 1990 June 11, received a report from the Acting Chief Public Health Inspector regarding the proposed Newstech de-inking facility to be constructed in Coquitlam, B. C.

In accordance with the recommendation contained in the report and adopted by Council a copy is provided for your information.

Very truly yours,

(Mrs.) D. R. Comis
DEPUTY MUNICIPAL CLERK

DRC:le

attach

APPENDIX 4

MPSC Correspondence with Newstech

Newstech Recycling Inc.

Ste. 1550 - Marine Building
355 Burrard Street, Vancouver, B.C., Canada V6C 2G8
PH. (604) 688-8533 FAX (604) 688-3569

A. Stuart Belkin
President

June 15, 1990

Mr. David Parsons
Co-Chairman
Major Project Review Committee
Ministry of Regional & Economic Development
712 Yates Street
Victoria, B.C.

Dear Mr. Parsons:

Re: Newstech Recycling Inc. Incoming Raw Material Monitoring

Further to your enquiry regarding the monitoring of incoming raw material to the Newstech plant we can advise that we will have a comprehensive raw material control system.

1). The first phase begins with the qualification of our raw material suppliers. Prior to being an authorized supplier to Newstech we will meet with a potential supplier to ensure that the very specific raw material specifications are understood by that potential supplier and that they understand that they will be held responsible for any objectionable material which they might allow inadvertently or otherwise to be in their pack. In addition prior to shipping from a new supplier we will require that product samples be provided containing a representative sample of paper sources in their region this material will be tested in Newstech's lab to ensure its suitability for repulping and de-inking. If this testing indicates concerns we will send the material out to an independent lab for more extensive testing and confirmation of product suitability before proceeding to work with the supplier.

2). When a shipment of raw material is received at the Newstech plant scale house the driver will identify, through production of shipping papers, the shipper of the material and this information will be transferred to a scale ticket which the driver will take with them to the tipping area/unloading dock.

. . . /2

The tipping or unloading of this material will take place under the supervision of a receiver/checker and will be on a concrete floor where it is levelled using a piece of mobile equipment and the receiver/checker will be responsible for insuring that the raw material received meets Newstech's quality specifications. The checkers signature approving the shipment will be required on the scale ticket in order for the scale house to accept the paperwork for scaling out and the payables entry for payment. If the load contains objectionable material which is identified during unloading the unloading procedure will be stopped, already unloaded material will be reloaded and the entire delivery will be shipped back to the consignor. In the event that the objectionable material is not identified at the time of unloading it will be Newstech's responsibility to ensure that such material is properly handled for approved disposal according to the nature of the objectionable material.

In the case of receiving baled raw material the procedures will be as above except that suppliers will be required to identify by tags attached to the baling wire each individual bale and upon receipt of a truck or railcar a minimum of 5 bales will be broken open and the receiver/checker will examine their contents to ensure that the material packed meets Newstech's raw material specifications.

Newstech notes that effective management of the incoming raw material supply is critical to not only the effective environmental monitoring of the process but the fiscal effectiveness of the operation. In addition to monitoring for environmentally unacceptable contaminants, Newstech must closely inspect incoming raw material for such variables as moisture content, the content of kraft papers the absence of plastics etcetera. As an industrial process which can only reach its product quality objectives by beginning with a raw material which conforms to specified standards the company has a fundamental imperative to properly monitor and assess its raw material supply on a vigilant basis.

. . . /3

I hope the above addresses your concerns but if you wish further dialogue on this subject please contact the writer.

Yours truly,

NEWSTECH RECYCLING INC.

Stuart Belkin
President

SB:sh

Hipp Engineering Ltd.
CONSULTING ENGINEERS
200 - 399 West 9th Avenue
Vancouver, B.C. Canada V5Y 1L1
Telephone (604) 872-5130
Fax (604) 872-3877
Telex 04-55683

17 July 1990

B.C. Ministry of Environment
Policy and Planning Branch
3rd Floor, 777 Broughton Street
Victoria, B.C.
V8V 1X5

Attention: Mr. D.W. Dryden

Dear Mr. Dryden:

This letter is in response to your letter dated today, sent by fax.

I wish to confirm to you that Hipp Engineering has taken full account of the flexographic ink content that is being introduced at Pacific Press. The process development for Newstech has been established from the outset on the basis that the flexographic ink content will gradually increase to approximately 25 per cent of the ONP furnish to Newstech. Our proposed major suppliers of process equipment have concurred with us that the Newstech operation will be one of the best of its kind in the world and will be able to produce the quality of OIP sought by Newstech's customers even at the future anticipated level of 25 per cent flexographic inks.

We have reviewed the flexo ink aspects of newsprint de-inking with Dr. Lothar Pfalzer, one of the world's leading de-inking specialists. His company, Voith Inc. of West Germany, is prepared to guarantee the achievement of Newstech's specifications (including brightness) utilizing the disclosed process engineering and chemical consumptions as set out in the Prospectus.

We hope that this written submission fully and satisfactorily addresses the concerns raised in your letter.

Yours truly,

HIPP ENGINEERING LTD.

Peter Hipp

cc. Mr. Derek Griffin
Mr. Mark Lofthouse
Mr. Stuart Belkin

PH/sd

Province of
British Columbia

Ministry of
Regional and
Economic Development

712 Yates Street
Victoria
British Columbia
V8V 1X5

File Copy/Day Copy

July 18, 1990

Mr. Stuart Belkin
President
Balaclava Enterprises Ltd.
Marine Building
Suite 550
355 Burrard Street
Vancouver, British Columbia
V6C 2G8

Dear Mr. Belkin:

The Major Project Steering Committee has now completed its review of Newstech's Prospectus for a proposed newsprint de-inking facility to be located in Coquitlam.

On the basis of the information contained in the Prospectus, and our review of public and agency comments on this project, we are pleased to inform you that the MPSC has granted approval-in-principle under the MPRP to Newstech's proposal, subject to your company agreeing to the following eight conditions:

1. MONITORING COMMITTEE

A Monitoring Committee, chaired by GVRD, will be formed to establish and oversee a monitoring and research program to be carried out by Newstech Recycling Inc. The monitoring program will provide for the sampling and testing of sludge, liquid effluents, source materials (for suitability) and selected process additives. The research program will provide for pilot studies for composting or land topdressing of the sludge. The provision of funding for the monitoring and research program will be the responsibility of Newstech.

.../2

2. SLUDGE DISPOSAL

Newstech will undertake pilot studies on composting of the sludge and will also pursue the option of disposal of the sludge as a topdressing to land. These activities will be undertaken in cooperation with the Monitoring Committee. The amount of sludge disposed to landfill must be reduced as soon as alternatives are proven acceptable. Sludge disposal to landfill will not be permitted beyond three years.

3. EFFLUENT TREATMENT AND DISCHARGE

All process water will be treated in a primary clarifier, secondary treatment facility (activated sludge), and a secondary clarifier before release to the GVRD sewer.

The effluent discharge will be required to meet GVRD's sewer use requirements and the levels of BOD, suspended solids, and toxicity of the Pulp and Paper Regulations under the federal Fisheries Act.

4. EMERGENCY RESPONSE PLAN

Prior to startup, Newstech will provide the Monitoring Committee with an Emergency Response Plan for potential spills of hazardous chemicals and for safeguards and procedures to be used during plant startup or upset conditions. The plan must provide assurance of adequate containment of spills to prevent discharge to the GVRD sewer system or to the Fraser River. A satisfactory program for training and testing of emergency response staff must be designed and implemented.

5. AIR QUALITY

Newstech will ensure that all air emissions from the plant meet the requirements of the GVRD.

6. FLOTATION PROCESS

Newstech will provide prior notice to the GVRD and the Regional Waste Manager, Ministry of Environment, if any alternate chemical is to be tested or used in the flotation process.

.../3

7. SITE CONTAMINATION TESTING

Newstech will undertake testing of soil and water on the plant site for contaminants, specifically chlorophenates, and will take remedial action, as required by the federal Department of Environment, in order to prevent the leaching or runoff of contaminated material into the Fraser River.

8. ARCHAEOLOGY

Newstech must ensure that archaeological resources protected under the Heritage Conservation Act are not inadvertently disturbed. Bore holes are to be interpreted for archaeological resource potential by a qualified archaeologist prior to construction activity. If archaeological remains are uncovered during construction (eg. human remains), Newstech should stop work and contact the Archaeology and Outdoor Recreation Branch.

Before approval-in-principle is formally granted, we require a written assurance that these conditions will be met. Please understand that the above conditions are in addition to any commitments made by Newstech, or Hipp Engineering, in its project Prospectus, and in subsequent communications with the MPSC and/or government agencies (specifically includes, but is not limited to, the correspondence from Mr. P. Hipp to Mr. D. Dryden dated July 17, 1990 and the letter from yourself to Mr. D. Parsons dated June 15, 1990).

As indicated in the MPRP Guidelines, MPRP approval-in-principle of your company's project will be valid for five years.

While the above conditions address all the major issues brought to the attention of the MPSC, there are a number of other issues which the MPSC believes that Newstech also needs to take into account. Although not conditions of MPRP approval-in-principle, the MPSC strongly recommends that Newstech respond to these other issues by undertaking the following actions:

- consult with B.C. Hydro on energy efficient measures for the plant;

.../4

- consult with surrounding Native people, and become sensitized to any concerns they may have regarding the project;

- consider hiring Native people from local bands; and
- consult with the Ministry of Social Services and Housing in regards to hiring procedures.

Finally, we wish to reiterate that the MPSC's conditional approval-in-principle applies only to the project as described in Newstech's Prospectus filed with the MPSC on April 26, 1990, and the additional subsequent correspondence referred to on Page 3. Should Newstech substantially change its project proposal, the Steering Committee will need to reconsider its decision.

We would ask you to indicate your acceptance of the above conditions in writing to the undersigned. If you have any questions, please contact either one of us, or in our absence, Mr. Derek Griffin, MPRP Coordinator, Ministry of Regional and Economic Development, at 387-0244.

Yours sincerely,

Frank Blasetti
Co-Chairman
Major Project
Steering Committee

Doug Dryden
Co-Chairman
Major Project
Steering Committee

cc: Mr. R. S. Plecas
Mr. R. Dalon
Members, Major Project
Steering Committee
Mr. R. Smith, GVRD

Newstech Recycling Inc.

Ste. 1550 - Marine Building
355 Burrard Street, Vancouver, B.C., Canada V6C 2G8
PH. (604) 688-8533 FAX (604) 688-3569

A. Stuart Belkin
President

Derek

RECEIVED
JUL 30 1990
1576
RESOURCE DEVELOPMENT BRANCH

July 23, 1990

Mr. Frank Blasetti
Co-Chairman
Major Project Steering Committee
Ministry of Regional & Economic Development
712 Yates Street
Victoria, B.C.

and

Mr. Doug Dryden
Co-Chairman
Major Project Steering Committee
Ministry of Regional & Economic Development
712 Yates Street
Victoria, B.C.

Dear Sirs:

Re: Newstech Recycling Inc. MPSC "approval in principal"

This is to advise we have received and reviewed your letter dated July 18, 1990 containing the conditions attached to the granting of the Major Project Review Committee approval for our newsprint recycling initiative. As we have previously stated we agree to observe the eight conditions contained therein.

Yours truly,

NEWSTECH RECYCLING INC.

Stuart Belkin
Stuart Belkin
President

SB:sh

MPRC/SB

Province of
Brit'sh Columbia

Ministry of
Regional and
Economic Development

712 Yates Street
Victoria
British Columbia
V8V 1X5

File Copy/Day Copy

August 3, 1990

Mr. Stuart Belkin
President
Balaclava Enterprices Ltd.
Marine Building
Suite 550
355 Burrard Street
Vancouver, British Columbia
V6C 2G8

Dear Mr. Belkin:

Thank you for your letter of July 23, 1990, in which you state your company's agreement to meet the eight conditions stipulated by the Major Project Steering Committee (MPSC) prior to approval-in-principle being granted under the Major Project Review Process (MPRP). These conditions were outlined in our letter to you of July 18th, 1990.

On the basis of your agreement to these conditions, the MPSC is pleased to formally grant its approval-in-principle to Newstech's proposed de-inking project. This approval-in-principle is valid for five years. If development of the project has not proceeded substantially within that time, the Steering Committee will review the validity of the approval terms and conditions and may require the submission of an updated report for review.

By copy of this letter, MPSC members are advised that Newstech's applications for permits and licenses from provincial and regional agencies may now be processed. The MPSC conditions will be written into the relevant permits and licenses.

As an indication of your commitment to the MPSC's conditions for approval-in-principle, we would encourage you to contact Ms. Cristina Jacob, Senior Project Engineer, GVRD Pollution Control, at 436-6739 at your earliest convenience to set up the initial meeting of the Monitoring Committee. The purpose of this meeting would be to establish membership and set up terms of reference for the Committee.

Thank you for your cooperation in this regard.

Yours sincerely,

for Mr. F. Blasetti
Co-Chairman
Major Project
Steering Committee

for Mr. D. Dryden
Co-Chairman
Major Project
Steering Committee

cc: MPSC Members
C. Jacob, GVRD

Recycled Paper